TECHNICAL DOCUMENT TO SUPPORT WATER RESERVATIONS FOR THE KISSIMMEE RIVER AND CHAIN OF LAKES

Draft Report

~~May~~August 2020

South Florida Water Management District

West Palm Beach, FL

EXECUTIVE SUMMARY

This document summarizes the technical basis for developing the Kissimmee River and Chain of Lakes Water Reservations by the South Florida Water Management District to protect fish and wildlife. Protection of fish and wildlife means ensuring the health and sustainability of fish and wildlife communities through natural cycles of drought, flood, and population variation. The proposed Water Reservation area encompasses approximately 172,500 acres, including the following waterbodies: 1) Upper Chain of Lakes (Lakes Hart and Mary Jane; Lakes Myrtle, Preston and Joel; East Lake Tohopekaliga; Lake Tohopekaliga; the Alligator Chain of Lakes; and Lake Gentry), 2) Headwaters Revitalization Lakes (Lake Kissimmee, Cypress Lake, Lake Hatchineha, and Tiger Lake), and 3) the Kissimmee River and floodplain as well as interconnected canals.

The Water Reservations will reserve from allocation 1) all surface water in the Kissimmee River and floodplain and in the Headwaters Revitalization Lakes; 2) quantities of surface water up to established water reservation stages in the Upper Chain of Lakes; and 3) surface water and groundwater in the surficial aquifer system, within contributing waterbodies that is required for the protection of fish and wildlife.

The Headwaters Revitalization Lakes are closely associated with the performance of the Kissimmee River Restoration Project (KRRP) and have a separate federal regulation schedule intended to meet the flow requirements of the KRRP. The KRRP involves an estimated $800 million public investment and was developed to address public concerns about the effects of the Central and Southern Florida Flood Control Project on the Kissimmee River—specifically the altered hydrology, loss of floodplain wetlands, and resulting loss of habitat and reduced populations of many species of fish and wildlife. Federal authorizations for the KRRP form the basis for reserving all surface water in the Kissimmee River and floodplain and in the Headwaters Revitalization Lakes.

This document describes how the Water Reservations were developed. All Water Reservations are adopted by rule in the Florida Administrative Code. Once the ~~draft~~ Water Reservation rules ~~are in effect~~become effective, they ~~will be~~are implemented in the South Florida Water Management District's water use permitting program to ensure future water uses will not withdraw reserved water. Direct and indirect withdrawals of water from the Kissimmee River and floodplain and the Headwaters Revitalization Lakes will be limited to existing permitted water use allocations (existing legal uses). Direct and indirect withdrawals of water from the Upper Chain of Lakes and contributing waterbodies will be limited to existing permitted water use allocations (existing legal uses) and quantities of surface water up to the proposed Water Reservation stages given in the draft Water Reservation rules, as discussed in **Chapter 5** of this document. All existing legal uses of water from the reservation and contributing waterbodies will continue to be protected after rule adoption if they are not contrary to the public interest.

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ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASUREMENT

2008 LORS	2008 Lake Okeechobee Regulation Schedule
AFET-W	Alternative Formulation and Evaluation Tool – Water Reservation
Applicant's Handbook	*Applicant's Handbook for Water Use Permit Applications in the South Florida Water Management District*
C&SF Project	Central and Southern Florida Flood Control Project
CERP	Comprehensive Everglades Restoration Plan
cfs	cubic feet per second
cm	centimeter
cm/s	centimeters per second
District	South Florida Water Management District
F.S.	Florida Statutes
FAS	Floridan aquifer system
ft	foot
ft/s	feet per second
FWC	Florida Fish and Wildlife Conservation Commission
HRS	Headwaters Revitalization Schedule
KCOL	Kissimmee Chain of Lakes
km	kilometer
KRRP	Kissimmee River Restoration Project
LKB	Lower Kissimmee Basin
LOSA	Lake Okeechobee Service Area
m	meter
MFL	Minimum Flow and Minimum Water Level
NGVD29	National Geodetic Vertical Datum of 1929
RAA	Restricted Allocation Area
SAS	surficial aquifer system
SFWMD	South Florida Water Management District
UCOL	Upper Chain of Lakes
UK-OPS	Upper Kissimmee – Operations Simulation (Model)
UKB	Upper Kissimmee Basin
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
WRL	water reservation line

CHAPTER 1: INTRODUCTION

1.1 Overview and Purpose of Document

This document summarizes the technical and scientific data, assumptions, models, and methodology used to support rule development to reserve water for the protection of fish and wildlife for specific waterbodies located in the Kissimmee River and Chain of Lakes. The meaning of “water needed to protect fish and wildlife” (i.e., ensuring the health and sustainability of fish and wildlife communities through natural cycles of drought, flood, and population variation) is discussed in more detail in **Chapter 2**. A Water Reservation is a legal mechanism to set aside water from consumptive use for the protection of fish and wildlife or for public health and safety. A Water Reservation may be established in such locations and quantities, and for such seasons of the year, as may be required for the protection of fish and wildlife or for public health and safety.

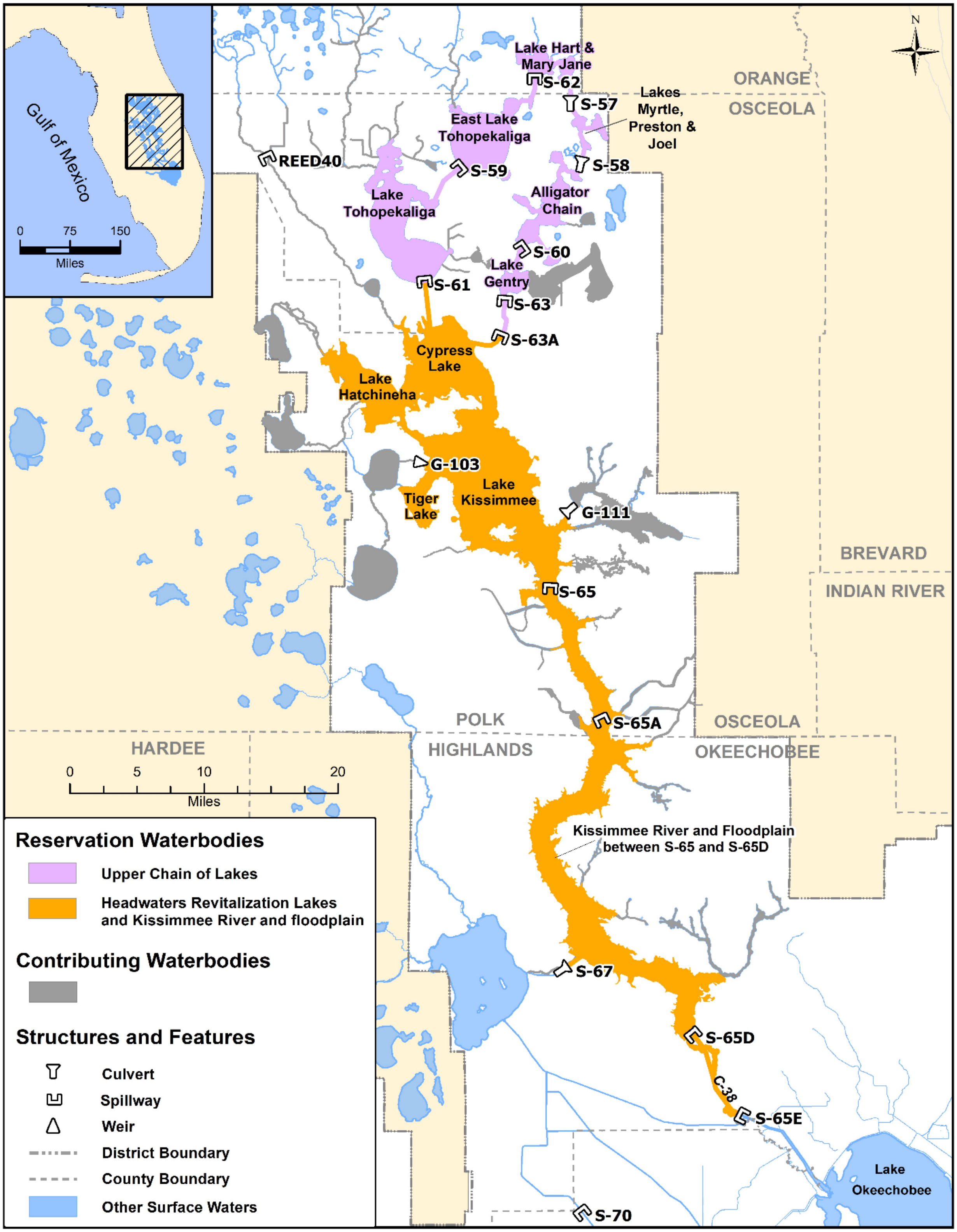
The waterbodies included in the proposed Kissimmee River and Chain of Lakes Water Reservations ~~(Water Reservations)~~ are components of the Central and Southern Florida Flood Control Project (C&SF Project). The C&SF Project is a multi-objective project, originally authorized by the Flood Control Act of 1948 and modified by subsequent acts, that provides for flood control, drainage, water supply, and other purposes. The South Florida Water Management District (SFWMD or District) is the local sponsor of the C&SF Project [Section 373.1501, Florida Statutes (F.S.)]. In 1992, the United States Congress authorized the C&SF Project to include ecosystem restoration of the Kissimmee River and improvement of habitat in the Kissimmee River Headwaters Lakes. In its capacity as local sponsor, the SFWMD operates and maintains the C&SF Project, including the subject reservation waterbodies. Operation of project components is required to occur in accordance with federally adopted regulation schedules and water management to meet project goals. The regulation schedules define maximum lake stages and water releases from the waterbodies and are specifically related to stage and time of year. Therefore, the proposed Kissimmee River and Chain of Lakes Water Reservations must dovetail with the authorized federal regulation schedules for the subject waterbodies.

1.2 Reservation Waterbodies

The reservation waterbodies are listed below and shown in **Figure 1-1**, and include contributing waterbodies or tributaries, as described in other chapters of this document.

1. Upper Chain of Lakes (UCOL) – six lake groups
    a. Lakes Hart-Mary Jane
    b. Lakes Myrtle-Preston-Joel
    c. Alligator Chain of Lakes
    d. Lake Gentry
    e. East Lake Tohopekaliga
    f. Lake Tohopekaliga
2. Headwaters Revitalization Lakes – one lake group
    a. Lakes Kissimmee-Cypress-Hatchineha-Tiger
3. Kissimmee River and floodplain

240



N
Gulf of Mexico
0 75 150
Miles
Lake Hart & Mary Jane
S-62
S-57
Lakes Myrtle, Preston & Joel
ORANGE
OSCEOLA
East Lake Tohopekaliga
REED40
S-59
S-58
Lake Tohopekaliga
Alligator Chain
S-60
Lake Gentry
S-61
S-63
S-63A
Cypress Lake
Lake Hatchineha
G-103
Lake Kissimmee
Tiger Lake
G-111
BREVARD
INDIAN RIVER
S-65
POLK
HIGHLANDS
S-65A
OSCEOLA
OKEECHOBEE
HARDEE
0 5 10 20
Miles
Kissimmee River and Floodplain between S-65 and S-65D
S-67
S-65D
C-38
S-65E
Lake Okeechobee
S-70
Reservation Waterbodies
Upper Chain of Lakes
Headwaters Revitalization Lakes and Kissimmee River and floodplain
Contributing Waterbodies
Structures and Features
Culvert
Spillway
Weir
District Boundary
County Boundary
Other Surface Waters

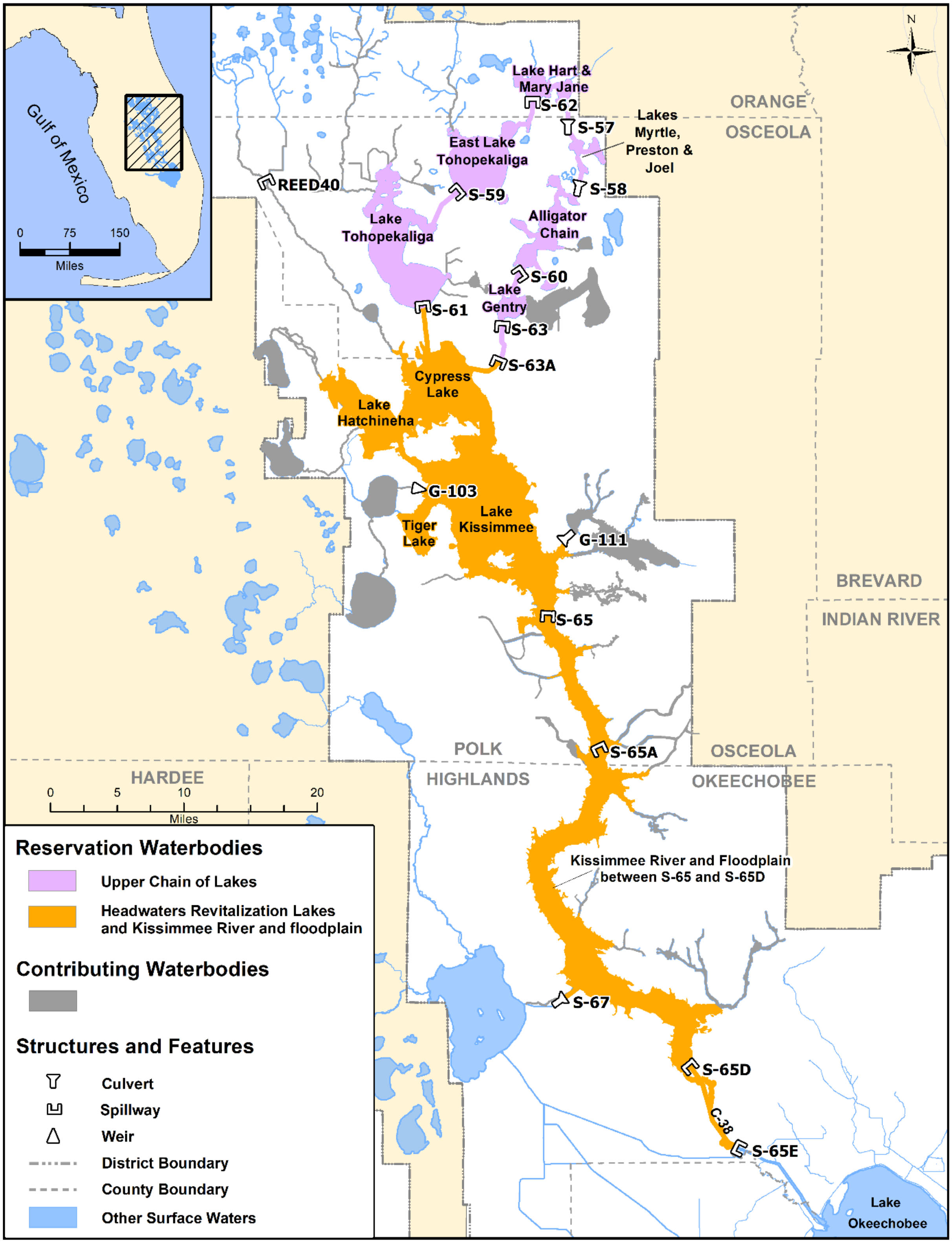


Figure 1-1. Kissimmee River and Chain of Lakes Water Reservation waterbodies.

The Kissimmee River reservation waterbodies include the Kissimmee River and its 100-year floodplain, as delineated by the United States Army Corps of Engineers (USACE), between the S-65 and S-65D structures; the Istokpoga Canal and floodplain east of the S-67 structure; and the C-38 Canal and remnant river channels from the S-65D to S-65E structures (**Figure 1-1**). It also includes restored sections of the Kissimmee River from the S-65 structure to Lake Okeechobee.

The remaining reservation waterbodies consist of one or more lakes and interconnecting canals in the Headwaters Revitalization Lakes and UCOL. These two groups of lakes, which contain several reservation waterbodies, are collectively referred to as the Kissimmee Chain of Lakes (KCOL). All waterbodies in these sections are part of the C&SF Project or are hydrologically connected to the C&SF Project by man-made or natural conveyance features, and they contribute flows to each other as well as to the Kissimmee River. These reservation waterbodies are managed in accordance with water control structure regulations and schedules prescribed by the USACE (1994), which are significant constraints that were considered in the quantification of water needed for protection of fish and wildlife. The reservation waterbodies and contributing waterbodies are described in more detail in **Chapter 3** and **Appendix A**. The water needed for the protection of fish and wildlife and proposed for reservation is described in **Chapter 5** and **Appendix B**.

In addition to their natural values, the reservation waterbodies are significant because, as part of a diverse group of wetland, lake, and river/floodplain ecosystems, they form a substantial portion of the headwaters of the Kissimmee-Okeechobee-Everglades system. SFWMD and other state and federal agencies have invested considerable resources in managing waterbodies in this region of Florida. The most noteworthy investment is the Kissimmee River Restoration Project (KRRP). The meandering Kissimmee River was channelized between 1962 and 1971, resulting in severe damage to the biological communities of the river and floodplain, which prompted immediate calls for restoration. The steps taken toward restoration of the Kissimmee River are summarized in **Section 1.3**.

1.3 Kissimmee River and Chain of Lakes Background

This section provides background information regarding events that helped form the need and basis for the Kissimmee River and Chain of Lakes Water Reservations. The long-term commitment of the federal government, State of Florida, and SFWMD to restore the Kissimmee River and floodplain under the KRRP is the genesis of many supporting activities. **Table 1-1** provides a brief chronology of major actions and events associated with the KRRP.

Table 1-1. Major actions and events in the planning, development, and implementation of the Kissimmee River Restoration Project.

Time Period	Major Action or Event
1920s-1940s	Hurricanes and flooding in the Upper Kissimmee Basin
1954	United States Congress authorizes the Kissimmee portion of the C&SF Project
1962-1971	C&SF Project channelizes the Kissimmee River
1971	Governor’s Conference on Water Management recommends restoration of the Kissimmee River
1976	Kissimmee River Restoration Act [Chapter 76-113, F.S.] creates the Kissimmee River Coordinating Council
1978-1985	First federal feasibility study notes potential for restoration, but federal funding not feasible (USACE 1985)
1983	Kissimmee River Coordinating Council recommends the backfilling plan
1984-1990	Kissimmee River Demonstration Project shows restoration is possible

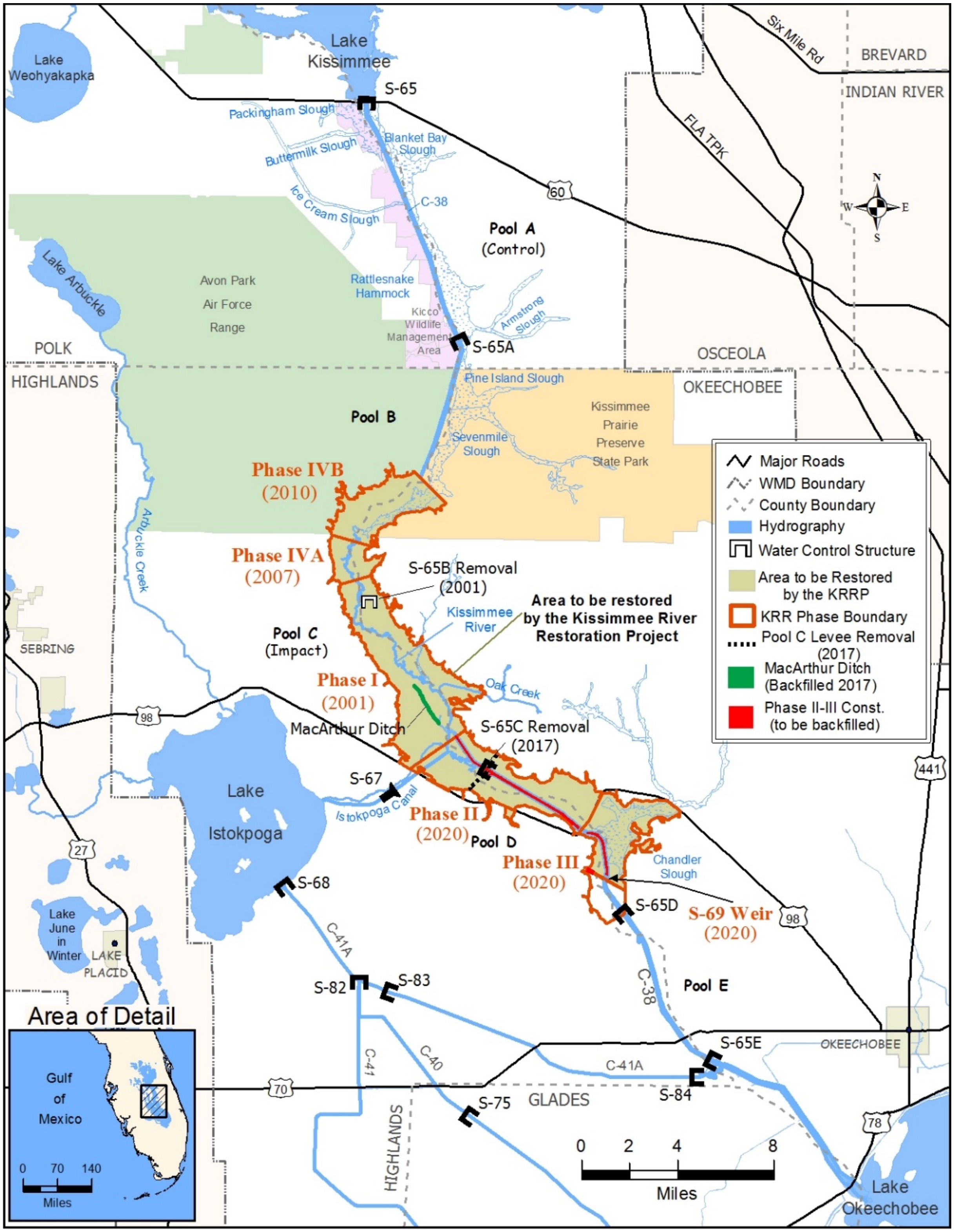
Time Period	Major Action or Event
1986	The Water Resources Act mandates that enhancements to environmental quality in the public interest should be calculated as equal to other costs
1988	Kissimmee River Restoration Symposium adopts the ecological integrity goal
1991	Second federal feasibility study recommends the Level II backfilling plan (USACE 1991)
1992	The Water Resources Development Act authorizes the Kissimmee River Restoration Project
1994	The Department of the Army and SFWMD (1994) sign a project cooperative agreement
1994	Construct test backfill and conduct high-flow tests on backfill stability
1996	Headwaters Revitalization Feasibility Study completed (USACE 1996)
1995-1999	SFWMD conducts baseline sampling for Phase I construction (Bousquin et al. 2005a)
1999-2001	Phase I backfilling completed, and monitoring continues (Bousquin et al. 2005a)
2006-2009	Phases IVA and IVB backfilling completed and monitoring continues
2014	Publication of nine manuscripts in *Restoration Ecology* on interim ecosystem response to restoration in the Phase I area (Anderson 2014a,b, Bousquin and Colee 2014, Cheek et al. 2014, Colangelo 2014, Jordon and Arrington 2014, Koebel and Bousquin 2014, Koebel et al. 2014, Spencer and Bousquin 2014)
2015-2020	Phase II/III backfilling and S-69 weir to be completed
2020	Expected implementation of Final Headwaters Revitalization Schedule following completion of all project construction and land acquisition
2020-2025	SFWMD to conduct post-construction monitoring and evaluation for Phases I and II/III construction areas

C&SF Project = Central and Southern Florida Flood Control Project; F.S. = Florida Statutes; SFWMD = South Florida Water Management District; USACE = United States Army Corps of Engineers.

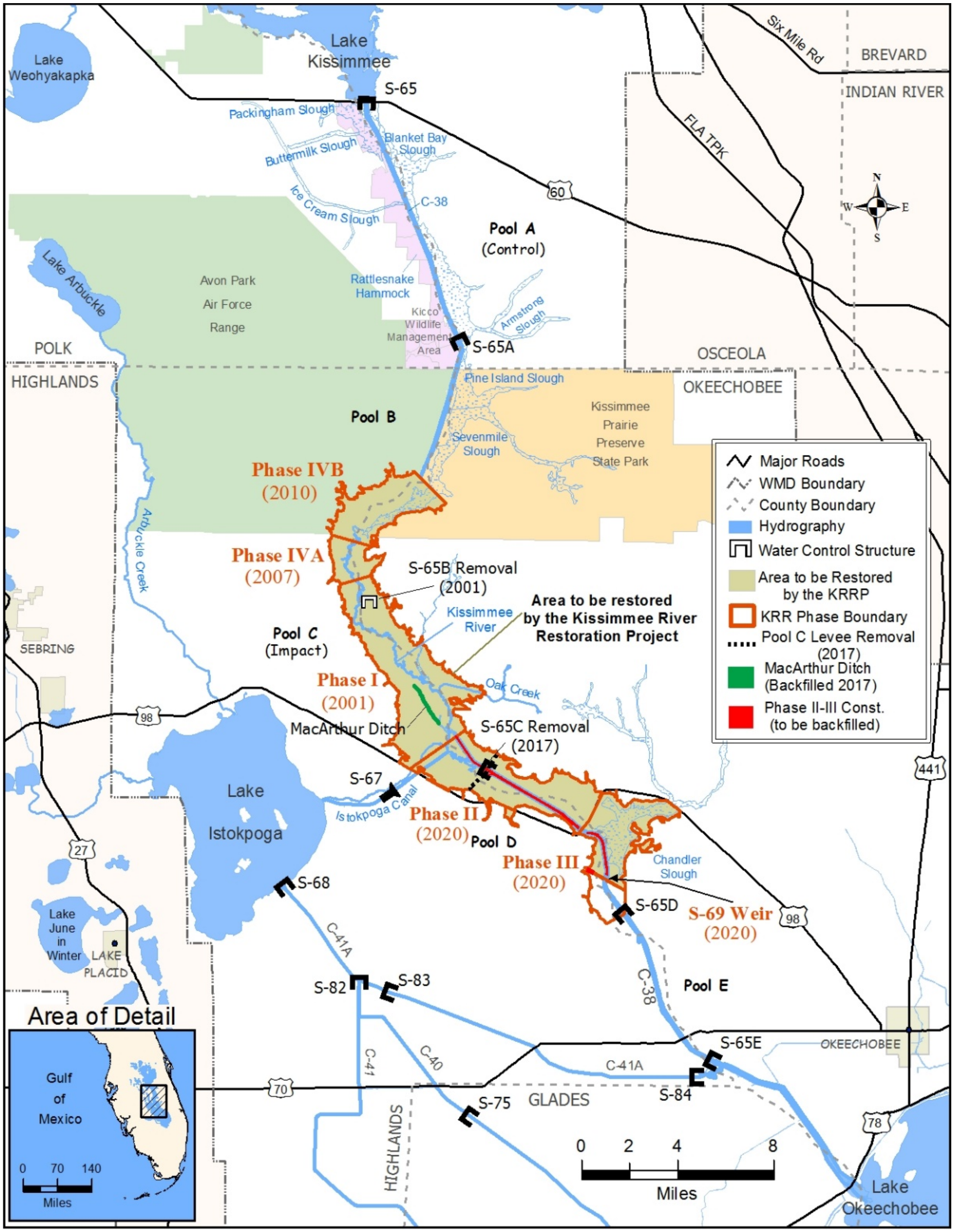
1.3.1 Kissimmee River Restoration

Before the Kissimmee River was channelized, it meandered for 103 miles between Lakes Kissimmee and Okeechobee (Koebel 1995). The river channel provided diverse habitats associated with sand bars and narrow vegetation beds as well as variable flow conditions depending on inflow and channel morphology (Toth et al. 1995). The river frequently overflowed its banks and inundated the 1- to 2-mile wide floodplain for extended periods of time, maintaining a mosaic of wetland plant communities. After the river was channelized by the construction of the C-38 flood control canal, most of the floodplain was drained and the remaining portions of the historical river channel no longer received flow. Because the canal conveyed all flow from the lakes to the north as well as local runoff, overbank flooding was virtually eliminated, ending significant inundation of the river's floodplain. As a result of these changes, habitat in the river channel and floodplain declined dramatically, with concomitant effects on native fish and wildlife.

Reconstruction of the Kissimmee River has been occurring in phases since 1999. Three of five construction phases are complete. Since completion of the first phase of construction, pre-channelization hydrologic conditions have been partially re-established (Bousquin et al. 2007, 2009), and partial recoveries have been documented in fish, wildlife, and plant communities. **Figure 1-2** shows the portion of the Kissimmee River that is being restored. Further improvement is expected after the new USACE Headwaters Revitalization Schedule (HRS), described in **Chapter 4**, is implemented at the S-65 water control structure, which controls discharge to the Kissimmee River. Until all phases of construction are complete, an interim regulation schedule is in place that does not provide the full benefits of the HRS. However, fish, wildlife, and habitat responses within project areas are being monitored using river/floodplain restoration performance measures under the SFWMD's Kissimmee River Restoration Evaluation Program. An integral component of the restoration is the reservation from allocation of water needed for protection of fish and wildlife. The water identified for the natural system will be protected through a Water Reservation, as authorized by Florida law.


Lake Kissimmee
Lake Weohyakapka
S-65
Packingham Slough
Buttermilk Slough
Blanket Bay Slough
Ice Cream Slough
C-38
Six Mile Rd
BREVARD
INDIAN RIVER
FLA TPK
60
Pool A
(Control)
Lake Arbuckle
Avon Park
Air Force
Range
Rattlesnake Hammock
Kicco Wildlife Management Area
Armstrong Slough
S-65A
POLK
HIGHLANDS
OSCEOLA
OKEECHOBEE
Pine Island Slough
Pool B
Kissimmee Prairie Preserve State Park
Sevenmile Slough
Phase IVB
(2010)
Phase IVA
(2007)
Arbuckle Creek
S-65B Removal
(2001)
Kissimmee River
Area to be restored by the Kissimmee River Restoration Project
SEBRING
Pool C
(Impact)
Phase I
(2001)
Oak Creek
98
MacArthur Ditch
S-65C Removal
(2017)
S-67
Lake Istokpoga
Istokpoga Canal
Phase II
(2020)
Pool D
Phase III
(2020)
Chandler Slough
27
S-68
S-65D
S-69 Weir
(2020)
Lake June in Winter
LAKE PLACID
C-41A
S-82
S-83
C-38
Pool E
441
Major Roads
WMD Boundary
County Boundary
Hydrography
Water Control Structure
Area to be Restored by the KRRP
KRR Phase Boundary
Pool C Levee Removal (2017)
MacArthur Ditch (Backfilled 2017)
Phase II-III Const. (to be backfilled)
Area of Detail
Gulf of Mexico
0 70 140
Miles
C-41
C-40
70
S-65E
OKEECHOBEE
C-41A
S-84
S-75
GLADES
HIGHLANDS
78
0 2 4 8
Miles
Lake Okeechobee

302



303 Figure 1-2. Map of the area being restored by the Kissimmee River Restoration Project.

1.3.2 Headwaters Revitalization Project

A key element of planning for the KRRP was development of a new regulation schedule for the S-65 structure (i.e., the HRS). The HRS was developed to provide the water storage and hydrology necessary to meet the ecological integrity goal of the KRRP (Koebel and Bousquin 2014). The HRS was authorized by Congress in 1992. In November 1996, the USACE issued its record of decision approving the recommended plan described in USACE (1996), including the construction plan and the new regulation schedule, finding it "to be economically justified, in accordance with environmental statutes, and in the public interest."

1.3.3 Central Florida Water Initiative

In 2006, the Central Florida Coordination Area "Action Plan" was initiated among three water management districts—St. Johns River Water Management District, Southwest Florida Water Management District, and SFWMD—to address short- and long-term development of water supplies in the Central Florida area, specifically Orange, Osceola, Seminole, Polk, and southern Lake counties. This effort evolved into the ongoing Central Florida Water Initiative, a collaborative effort among the aforementioned water management districts, other government agencies, and various stakeholders to address current and long-term water supply needs in a five-county area in the Central Florida region. In November 2015, the Governing Boards of the three water management districts approved the 2015 Central Florida Water Initiative Regional Water Supply Plan (Central Florida Water Initiative 2015), including the 2035 Water Resources Protection and Water Supply Strategies Plan.

At the time of this writing, the draft 2020 Central Florida Water Initiative Regional Water Supply Plan is undergoing public review and comment. Governing boards of the three water management districts are anticipated to approve the plan in November 2020. The draft plan recognizes the SFWMD is developing the Kissimmee River and Chain of Lakes Water Reservations to protect the volume of water needed for fish and wildlife in the Kissimmee River restored conditions. The increased demands projected through 2040 in the draft plan can be met through development of alternative water supplies and other management strategies. Potential project options do not include surface water from the Kissimmee River and Chain of Lakes.

Both the water supply planning CUP/WUP permitting programs are tools that the Florida Legislature has provided to the Districts to protect water resources. In 2016, the legislature supported regulatory consistency in the CFWI Planning Area and set forth rulemaking requirements for the FDEP (Section 373.0465(2)(d), F.S.). The FDEP published a notice of rule development on December 30, 2016. The FDEP held numerous workshops, in coordination with the Districts, FDACS, and other stakeholders, to adopt uniform rules for application within the CFWI Planning Area. That effort is currently underway.

1.4 Prior Work on the Kissimmee River and Chain of Lakes Water Reservations

In June 2008, SFWMD's Governing Board initiated rule development for the Kissimmee River and Chain of ~~Lakes's~~Lakes Water Reservation. The technical information presented here identifies the hydrologic requirements to ensure protection of fish and wildlife and forms the basis for the current rule development process.

In March 2009, SFWMD (2009) developed a draft technical document to support Water Reservation rule development efforts. The document was evaluated by an independent, scientific peer-review panel in April 2009, in accordance with Florida Department of Environmental Protection guidance in Rule 62-40.474(4), Florida Administrative Code. The 2009 peer-review panel was asked to assess the scientific and technical

data, methodologies, models, and assumptions employed in each model, as summarized in the 2009 draft technical document, and evaluate their validity and soundness. The peer-review panel found the supporting data and information used were technically sound, including the inferences and assumptions made regarding the linkages between hydrology and the protection of fish and wildlife (Aday et al. 2009).

The initial Water Reservation development effort was suspended due to ongoing work that, at the time, had the potential to change the regulation schedules within the UCOL. In June 2014, SFWMD's Governing Board reinitiated the Water Reservation rule development effort. A public rule development workshop was held on July 30, 2014. On December 12, 2014, draft Water Reservation rules were presented during a rule development workshop. In March 2015, a draft technical document was developed (SFWMD 2015a), and public comments on the draft were solicited. Rule development efforts were suspended again in 2016 to address concerns related to threatened and endangered species. Work on the Kissimmee River and Chain of Lakes Water Reservations began again in 2018, and the technical document was updated to its present form. Once adopted, the Water Reservation rule criteria will be implemented in the SFWMD's water use permitting program and will require applicants to provide reasonable assurance that their proposed use of water will not withdraw water reserved for the protection of fish and wildlife in the Kissimmee River and Chain of Lakes.

SFWMD's technical approach to quantify water needed for the protection of fish and wildlife in the Kissimmee River and Chain of Lakes is outlined in **Chapters 3** through **5** and involves several steps, including identification of the following:

1. Water reservation waterbodies;
2. Habitat and fish and wildlife species to be protected;
3. Hydrologic links to habitat, fish, and wildlife; and
4. Water volumes to be reserved.

CHAPTER 2: BASIS FOR WATER RESERVATIONS

2.1 Definition and Statutory Authority

~~A Water Reservation is a legal mechanism to reserve a quantity of water from consumptive use for the protection of fish and wildlife or for public health and safety.~~

Section 373.223(4), F.S., states the following:

> *The governing board or the department, by regulation, may reserve from use by permit applicants, water in such locations and quantities, and for such seasons of the year, as in its judgment may be required for the protection of fish and wildlife or the public health and safety. Such reservations shall be subject to periodic review and revision in the light of changed conditions. However, all presently existing legal uses of water shall be protected so long as such use is not contrary to the public interest.*

~~It is reasonable to interpret "protection"~~A water reservation is a legal mechanism to reserve a quantity of water from consumptive use for the protection of fish and wildlife or for public health and safety. In Association of Florida Community Developers v. Department of Environmental Protection, DOAH Case 04-000880RP, "protection" was reasonably interpreted to mean ensuring the health and sustainability of fish and wildlife communities through natural cycles of drought, flood, and population variation. ~~*See* Fla. Div. of Admin. Hr'gs (2006) Case 04-000880RP.~~

When water is reserved pursuant to Section 373.223(4), F.S., it is unavailable for allocation to new or increased consumptive uses. ~~However, existing~~Existing legal uses of water are protected so long as such uses are not contrary to the public interest. An existing legal use is a water use that is authorized in a water use permit pursuant to Part II of Chapter 373, F.S., or is exempt from water use permit requirements.

The Florida Legislature gave broad discretion to the Governing Boards of Florida's five water management districts to exercise judgment in establishing water reservation, taking into consideration the water needs of fish and wildlife as well as public health and safety while also balancing the overall district missions. Districts are directed to periodically review and revise adopted water reservations, as needed, to achieve this balance.

It is equally important to understand the limitations of water reservations. Water reservations do not drought-proof a natural system, ensure wildlife proliferation, or establish an operating regime. While Part II, Chapter 373, F.S., authorizes SFWMD to permit consumptive uses and establish water reservations, it does not authorize SFWMD to establish operating criteria for the C&SF Project system or for Comprehensive Everglades Restoration Plan (CERP) projects. C&SF Project system and CERP project operating criteria are established by USACE and implemented by SFWMD through federal and state authorities. However, the project operating criteria affect the timing and availability of water in the District; therefore, the operating plans must be consistent with established Water Reservation and permitted water allocations.

~~The Florida Legislature gave broad discretion to the Governing Boards of Florida's five water management districts to exercise judgment in establishing water reservation, taking into consideration the water needs of fish and wildlife as well as public health and safety while also balancing the overall district missions. Districts are directed to periodically review and revise adopted water reservations, as needed, to achieve this balance.~~

The SFWMD elected to use its Water Reservation authority conferred by Section 373.223(4), F.S., to reserve quantities of water in the Kissimmee River and Chain of Lakes for the protection of fish and wildlife. ~~The draft~~The Kissimmee River and Chain of Lakes Water Reservation rules also support the restoration goals and objectives of the KRRP. The rulemaking is based on the technical information and recommendations in this document.

2.2 Water Reservation Rulemaking Process

The general process of Water Reservation rulemaking includes several steps (**Figure 2-1**). The Kissimmee River and Chain of Lakes Water Reservations rule development originally was authorized by the SFWMD Governing Board in June 2008. Analyses and a supporting technical document were completed and peer reviewed in 2009. The project was subsequently postponed in 2009, but SFWMD's Governing Board authorized re-initiation of the project on June 12, 2014. A new Notice of Rule Development was published in the Florida Administrative Register on July 16, 2014. Building on the initial technical analysis conducted in 2008-2009, new and updated analyses and modeling were completed, and an updated technical document and Water Reservation rules were drafted between 2014 and 2016. Public workshops and key stakeholder meetings were held on July 30, 2014, December 12, 2014, January 08, 2015 (Water Resource Advisory Commission meeting), January 06, 2016, March 15, 2016, March 30, 2016, and April 08, 2016, to gain public input on the rulemaking process.

Since 2016, the Upper Kissimmee – Operations Simulation (UK-OPS) Model was completed for application to the rulemaking process, and revision of the draft Water Reservation rules, applicable sections of the *Applicant's Handbook for Water Use Permit Applications in the South Florida Water Management District* (Applicant's Handbook; SFWMD 2015b), and the revised technical document were completed. The detailed model documentation report for the UK-OPS Model is included as **Appendix C**. An independent, scientific peer review of the UK-OPS Model (**Appendix D**) was completed in November 2019. For more information regarding the 2009 peer review please see **Appendix E**. Public comments received in 2020 are provided in **Appendices G** and **H**.

Once consensus is reached and the draft Water Reservation rules are finalized, they will be presented to the SFWMD Governing Board for adoption. The SFWMD encourages stakeholder review and comment on the draft Water Reservation rules. There will be opportunities in future rule development workshops for stakeholders to give feedback prior to final rule adoption.

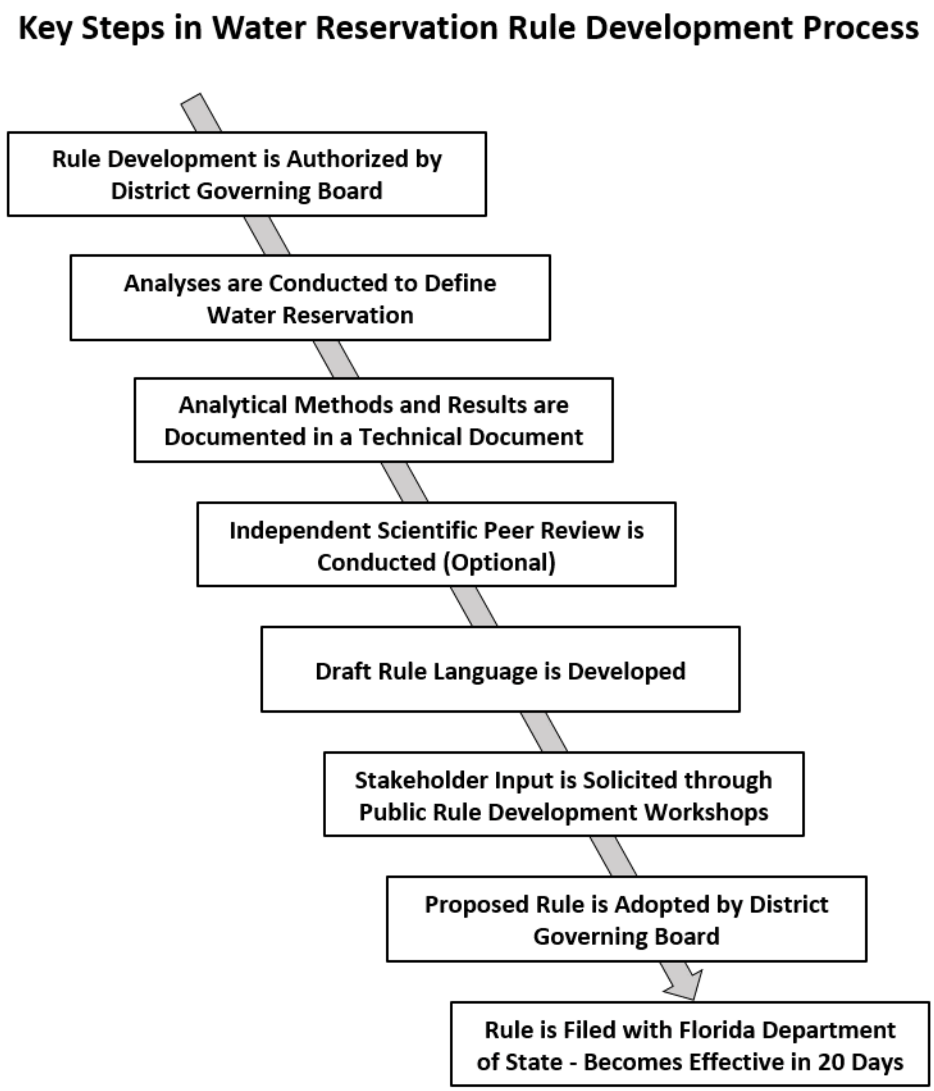


Figure 2-1. Water Reservation rule development process.

CHAPTER 3: DESCRIPTION OF RESERVATION WATERBODIES

3.1 Kissimmee Basin Overview

Located in Central Florida, the Kissimmee Basin encompasses the SFWMD's Upper Kissimmee Basin (UKB) and Lower Kissimmee Basin (LKB) water supply planning areas (**Figure 3-1**). The Kissimmee Basin is bounded to the north and east by the St. Johns River Water Management District, to the west by the Southwest Florida Water Management District, and to the south by Lake Okeechobee. Within its boundary are all or portions of six counties—Orange, Osceola, Polk, Highlands, Okeechobee, and Glades.

The Kissimmee Basin experiences a humid, subtropical climate with wet and dry seasons of nearly equal length. Average yearly rainfall is 48 inches (121 centimeters [cm]) in the UKB and 45 to 50 inches (114 to 127 cm) in the LKB. Most precipitation falls during a distinct wet season (June to October). Air temperature ranges from 41 to 86 degrees Fahrenheit (5 to 30 degrees Celsius).

The major physiographic features of the Kissimmee Basin were formed when much of Florida was submerged (White 1970). The Kissimmee Basin has a roughly north-northwest to south-southeast alignment that parallels relict sandy beach ridges created by longshore currents (Warne et al. 2000). Most of the basin lies within the Osceola Plain, which is 40 miles wide and 100 miles long. The Osceola Plain is bounded to the west by the Lake Wales Ridge and to the northwest by the Mount Dora and Orlando ridges (White 1970). A scarp separates the Osceola Plain from the Eastern Valley on the northeastern and eastern borders and from the Okeechobee Plain to the south. The highest elevation of the Osceola Plain occurs in the northwest corner, where it rises to 90 to 95 feet (ft) National Geodetic Vertical Datum of 1929 (NGVD29). However, most of the plain occurs between 60 and 70 ft NGVD29.

The remainder of the Kissimmee Basin lies on the Okeechobee Plain, which is 30 miles wide and 30 miles long. From the toe of the scarp separating it from the Osceola Plain, the elevation of the Okeechobee Plain decreases from 40 to 20 ft NGVD29 at the northern shore of Lake Okeechobee.

The sandy soils found throughout the Kissimmee Basin are derived primarily from marine-deposited silica sands. Most soil types in the UKB and LKB are classified under the Smyrna-Myakka-Basinger Soil Association. Additional information may be found in the Geotechnical Investigations Appendix of the *Central and Southern Florida Final Integrated Feasibility Report and Environmental Impact Statement Environmental Restoration Kissimmee River, Florida* (USACE 1991).

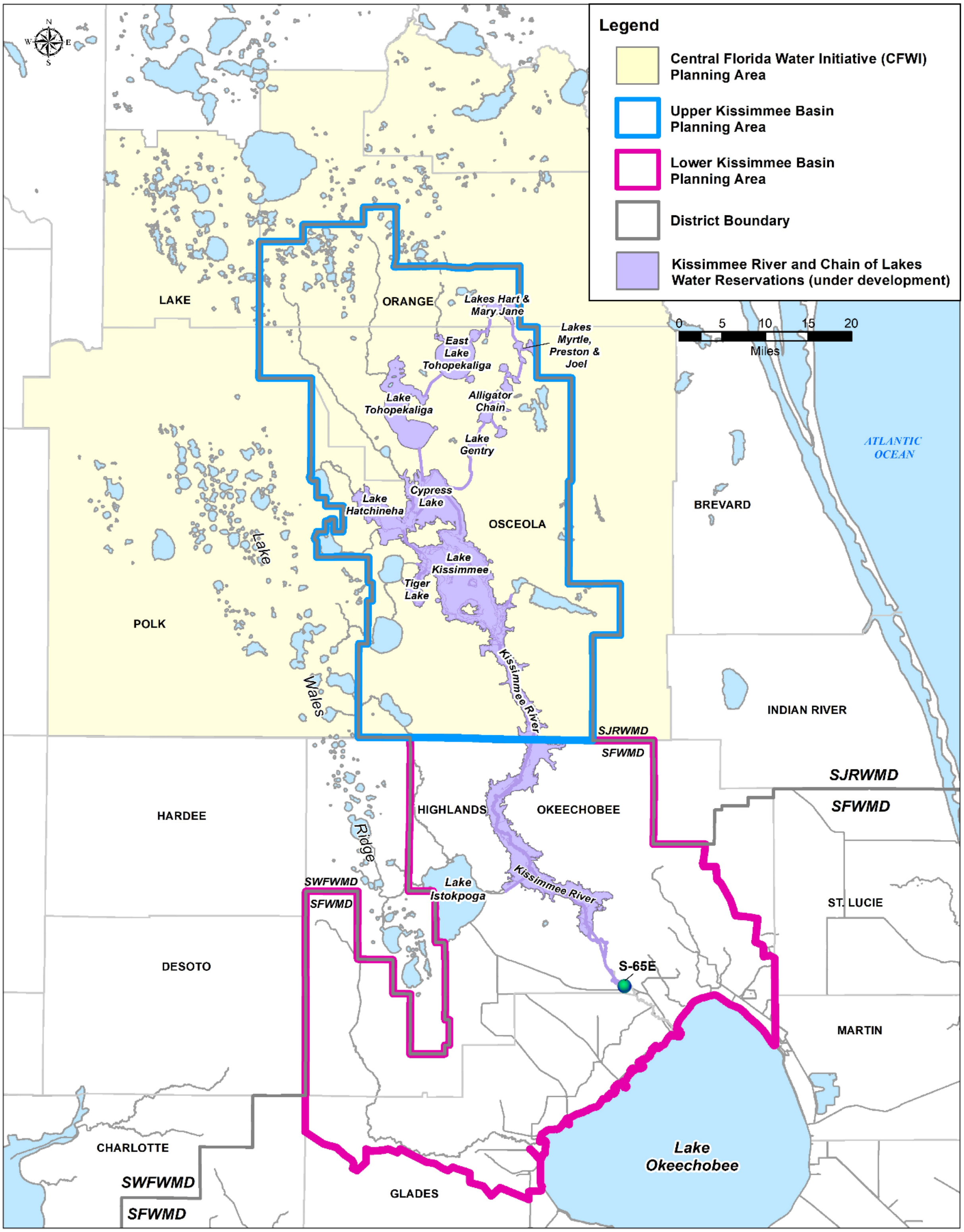


Figure 3-1. Map of the Upper and Lower Kissimmee Basins.

3.2 Surface Water Resources

The UKB has been incorporated into the Central Florida Water Initiative planning area (**Section 1.3.3**) and extends south to the Polk and Osceola county line (**Figure 3-1**). The UKB is 1,~~607~~581 square miles (4,~~162~~095 square kilometers [km^2~~]), more~~]) and is 115 square miles smaller than ~~twice the area of~~ the LKB. The UKB contains hundreds of lakes and wetlands, with the largest lakes occurring along the eastern and southern boundaries (**Figure 3-1**). Lake Kissimmee, the third largest lake in Florida (Brenner et al. 1990), is the outlet of the UKB to the Kissimmee River. Water throughout the UKB is conveyed to the Kissimmee Chain of Lakes (KCOL)—which includes the Headwaters Revitalization Lakes (Lakes Kissimmee, Hatchineha, Cypress, and Tiger) and the Upper Chain of Lakes (UCOL)—through wetlands, sloughs, and tributary streams. The largest tributaries are Boggy, Shingle, and Reedy creeks as well as Big Bend Swamp. Boggy Creek begins at the northern boundary of the basin in the City of Orlando and flows southward into the north end of East Lake Tohopekaliga. Shingle Creek also originates in the City of Orlando and conveys surface water to Lake Tohopekaliga. Reedy Creek originates in the northwest corner of the basin. Near the mouth, Reedy Creek branches, with most of the flow going to the southern branch (Dead River) into Lake Hatchineha and the remaining flow goes through the northern branch into Lake Cypress. Big Bend Swamp is located southeast of the Alligator Chain of Lakes, is connected by extensive shoreline to Brick Lake, and flows into Lake Gentry. The KCOL are interconnected by a series of canals. Essentially all surface water draining the UKB is funneled to the KCOL, which discharge into the Kissimmee River (Warne et al. 2000).

The LKB encompasses ~~669~~1,696 square miles (~~1,733~~4,393 km^2) directly north and west of Lake Okeechobee (**Figure 3-1**). The dominant hydrologic feature is the Kissimmee River, which receives flows from the KCOL via the C-38 Canal and discharges south to Lake Okeechobee. The Kissimmee River is the largest tributary to Lake Okeechobee, accounting for approximately 50% of the lake's inflows (SFWMD 2019). The drainage network in the LKB is not well developed and is composed mostly of tributary sloughs. Consequently, the larger UKB is a more important source of water for the Kissimmee River than its tributary watershed.

3.3 Connectivity of the Waterbodies

Connectivity of the surface waterbodies of the Kissimmee Basin has changed over time. Before human modifications, there was a direct connection between the Kissimmee River and several lakes. In 1842, it was possible to travel by boat up the Kissimmee River and across Lakes Kissimmee, Hatchineha, and Cypress to Lake Tohopekaliga (Preble 1945). While well-defined channels did not connect all the lakes, water likely moved between lakes by overland flow during wetter years and by groundwater movement during drier conditions (Warne et al. 2000).

During the 1880s, canals were dredged between lakes in the KCOL as part of a drainage project to reclaim land. Another part of the project dredged a connection between Lake Okeechobee and the Caloosahatchee River. By 1882, it was possible to travel by steamboat from the Town of Kissimmee on Lake Tohopekaliga through Lake Kissimmee then down the Kissimmee River, across Lake Okeechobee, down the Caloosahatchee River to Fort Myers, and ultimately to the Gulf of Mexico.

In the Rivers and Harbors Act of 1902, the United States Congress authorized a federal navigation project with "a channel width of 30 feet and depth of 3 feet at the ordinary stage of the river" from the town of Kissimmee at the northern end of Lake Tohopekaliga through Lakes Cypress, Hatchineha, and Kissimmee and down the Kissimmee River to Fort Basinger. The navigation project involved removal of large woody snags and dredging of channels, as necessary. It was completed by the USACE between 1902 and 1909. In 1927, the USACE conducted the last federal maintenance dredging for the project.

In addition to these large projects, several small projects were conducted by private landowners and local companies. Such projects included small structures on the Zipprer Canal between Lakes Rosalie and Kissimmee and a structure on the Istokpoga Canal between Lake Istokpoga and the Kissimmee River. Other small drainage ditches and levees were constructed by private landowners.

In 1947, hurricanes caused severe flooding in much of South Florida, including the Kissimmee Basin. In response to a request for help from the State of Florida, the United States Congress authorized the C&SF Project in 1949. Features affecting the Kissimmee Basin were authorized in 1954 and constructed between 1962 and 1972. These projects included enlarging existing canals, dredging a new canal to connect Lake Gentry to Lake Cypress, and installing nine water control structures to regulate water levels and flows between the lakes. The structures are responsible for the current path of water movement through the KCOL (**Figure 3-2**). Operation of the structures narrowed the range of water level fluctuation in the lakes, reducing the amount and quality of habitat for fish and wildlife.

Part of the C&SF Project included constructing the C-38 Canal, which channelized the entire length of the Kissimmee River between Lakes Kissimmee and Okeechobee. In addition to the S-65 structure, located at the outlet from Lake Kissimmee, five water control structures (S-65A to S-65E) were installed along the C-38 Canal to step-down water levels and control flow within the river. Channelization and flow regulation greatly altered flow conditions in the river and water levels on the floodplain, which had immediate effects on fish and wildlife. These changes were so dramatic in the LKB that they sparked a grassroots movement ultimately leading to a partnership between SFWMD and USACE to restore the Kissimmee River.

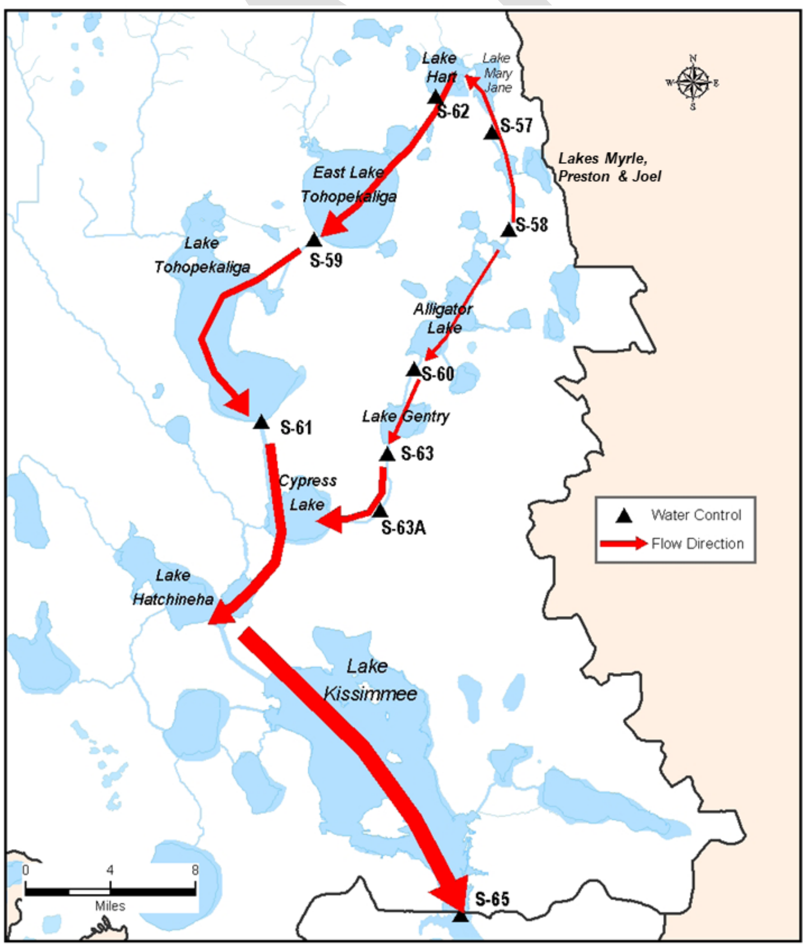


Figure 3-2. Flow of water through the Kissimmee Chain of Lakes.

3.4 Groundwater

The Kissimmee Basin has a complex groundwater system that includes three major hydrogeologic units: the surficial aquifer system (SAS), the intermediate confining unit, and the Floridan aquifer system (FAS). On a broad scale, the FAS is further subdivided into the Upper Floridan aquifer and the Lower Floridan aquifer, which are separated by a semi-confining unit (Miller 1990). These hydrogeologic units have different characteristics that influence the volume of water they contain (**Table 3-1**). Reese and Richardson (2008) redefined these units and provided a hydrogeologic framework for modeling the groundwater system that uses multiple methods for identifying hydrostratigraphic units, including lithologic and geophysical methods. This was used in the modeling done for the Kissimmee River and Chain of Lakes Water Reservations. The thicknesses of the layers vary across the Kissimmee Basin. The magnitude and direction of water interchange between the different aquifers depend on the relative elevation of the potentiometric surfaces of the aquifers and the thickness and vertical permeability of the intervening confining units.

The SAS is primarily recharged by rainfall. Aucott (1988) mapped regional variations in water exchange between the SAS and Upper Floridan aquifer in Florida. The Upper Floridan aquifer in the northern portion of the Kissimmee Basin is recharged by direct downward leakance (e.g., through sinkholes) from the SAS, and where present, through the intermediate confining unit (Aucott 1988, Shaw and Trost 1984, Adamski and German 2004). Recharge to the FAS is high along the Lake Wales, Mount Dora, and Bombing Range ridges where the confining layer is either thin or breached and where elevation differences between the SAS and FAS are greatest (SFWMD 2007). In this area of connection, the SAS consists of fine- to medium-grained quartz sand with varying amounts of silt, clay, and shell deposits.

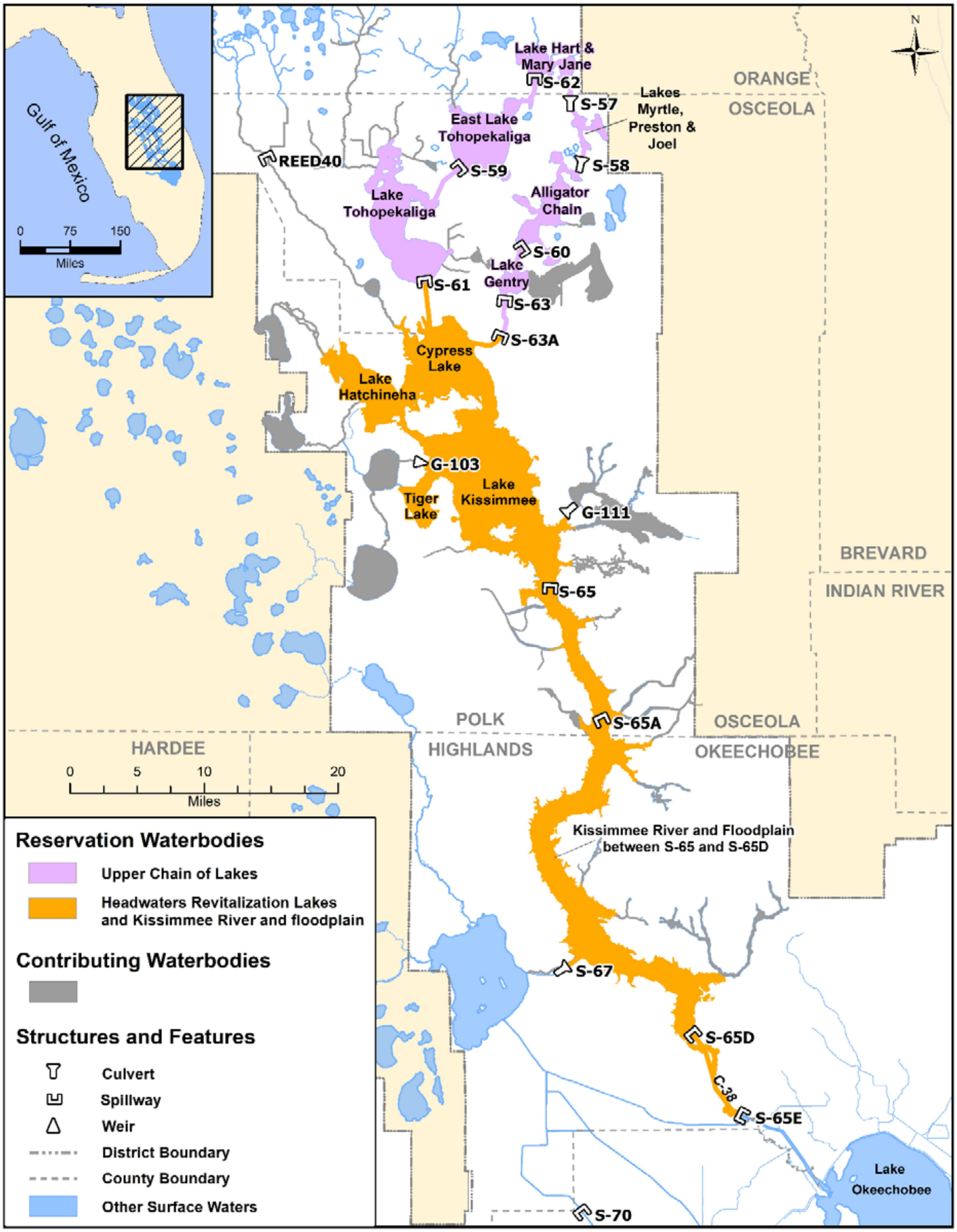
Table 3-1. Characteristics and potential for water yield from the hydrogeologic layers of the groundwater system in the Kissimmee Basin (Based on: SFWMD 2007).

Hydrogeologic Unit	Characteristics	Potential for Water Yield
Surficial aquifer system	Unconfined aquifer with fine- to medium-grained quartz sand with varying amounts of silt, clay, and crushed shell. Represents the water table.	Yields low quantities of water to wells. Good to fair quality water. Limited to residential supply, lawn irrigation, and small-scale agricultural irrigation.
Intermediate confining unit	Low-permeability sediments and rocks that retard the exchange of water between the surficial and Floridan aquifer systems. Contains interbedded sands, calcareous silts and clays, shell, phosphoric limestone, and dolomite of the Hawthorn group (Miocene).	Not an important source of water, except for a few isolated areas within the Kissimmee Basin.
Floridan Aquifer System		
Upper Floridan aquifer	High permeability with carbonate rock (limestone and dolomite).	Source of virtually all the water used to meet municipal, industrial, and agricultural needs in the Kissimmee Basin.
Semi-confining unit	Less permeable.	Unknown.
Lower Floridan aquifer	High permeability with alternating beds of limestone and dolomite characterized by abundant fractures and solution cavities.	Increasingly used for water supply.

3.5 Reservation and Contributing Waterbodies

Chapter 1 identified the proposed reservation waterbodies. This section provides additional information about the reservation waterbodies and the waterbodies that contribute to them. This section should be reviewed in conjunction with the information, tables, and figures in **Appendix A**. The reservation waterbodies were selected for consideration because they are closely linked and represent substantial water resources important for fish and wildlife. The reservation waterbodies support a world-class sport fisheries population and provide important habitat for several threatened and endangered species. The fish and wildlife resources associated with the reservation waterbodies are described in more detail in **Chapter 4** and **Appendix F**.

Many of the reservation waterbodies are connected; continuously or intermittently receiving substantial inflows (in terms of timing and volume) from other water sources such as wetlands, sloughs, lakes, streams, creeks, canals, and ditches, which are considered contributing waterbodies (**Figure 3-3**). The surface water inflows from these contributing waterbodies are integral to maintaining the hydrologic regime of the reservation waterbodies to ensure protection of fish and wildlife. Under the draft Water Reservation rules, withdrawals from reservation and contributing waterbodies will be regulated, as outlined in Subsection 3.11.5 of the Applicant's Handbook (SFWMD 2015b). Contributing waterbodies are currently regulated under Subsection 3.3 of the Applicant's Handbook (SFWMD 2015b); however, additional permitting criteria have been added to ensure protection of water needed for fish and wildlife. In summary, the reservation and contributing waterbodies will be regulated to ensure protection of water needed for fish and wildlife. A more detailed description of the regulatory constraints is provided in **Chapter 5**.


Gulf of Mexico
0 75 150
Miles
Lake Hart & Mary Jane
S-62
S-57
Lakes Myrtle, Preston & Joel
ORANGE
OSCEOLA
East Lake Tohopekaliga
REED40
S-59
S-58
Lake Tohopekaliga
Alligator Chain
S-60
Lake Gentry
S-61
S-63
S-63A
Cypress Lake
Lake Hatchineha
G-103
Lake Kissimmee
Tiger Lake
G-111
BREVARD
INDIAN RIVER
S-65
POLK
HIGHLANDS
S-65A
OSCEOLA
OKEECHOBEE
HARDEE
0 5 10 20
Miles
Kissimmee River and Floodplain between S-65 and S-65D
S-67
S-65D
C-38
S-65E
Lake Okeechobee
S-70
Reservation Waterbodies
Upper Chain of Lakes
Headwaters Revitalization Lakes and Kissimmee River and floodplain
Contributing Waterbodies
Structures and Features
Culvert
Spillway
Weir
District Boundary
County Boundary
Other Surface Waters

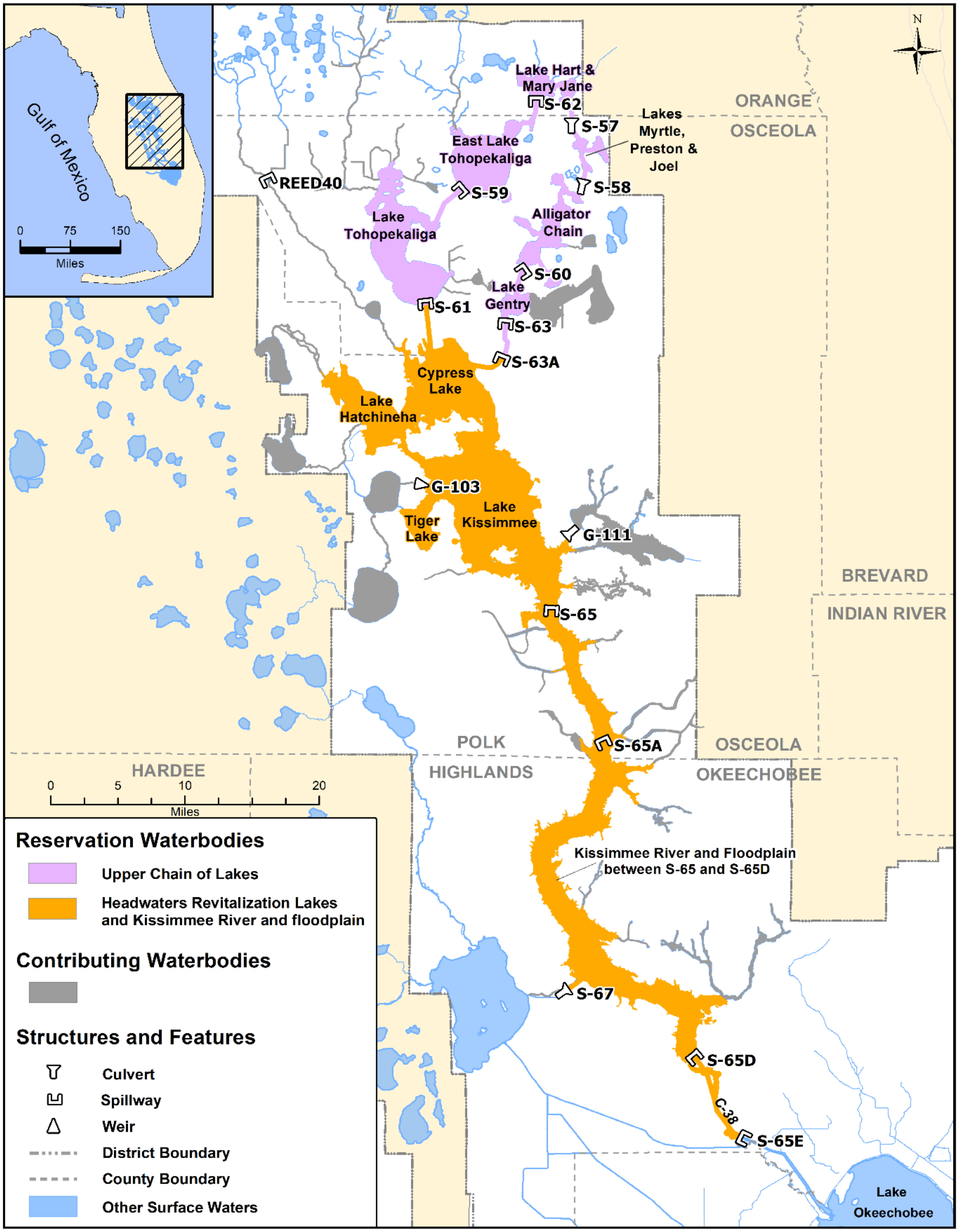


Figure 3-3. Reservation and contributing waterbodies associated with the Kissimmee River and Chain of Lakes Water Reservations.

3.5.1 Kissimmee River

The approximate extent of the Kissimmee River reservation waterbody is shown in **Figure 3-4**. It is bounded by the 100-year flood elevation as delineated by the USACE (1991) between structures S-65 and S-65D and the portion of the Istokpoga Canal and floodplain east of the S-67 structure. It also includes the C-38 Canal and remnant (non-flowing) river channels between the S-65D and S-65E structures.

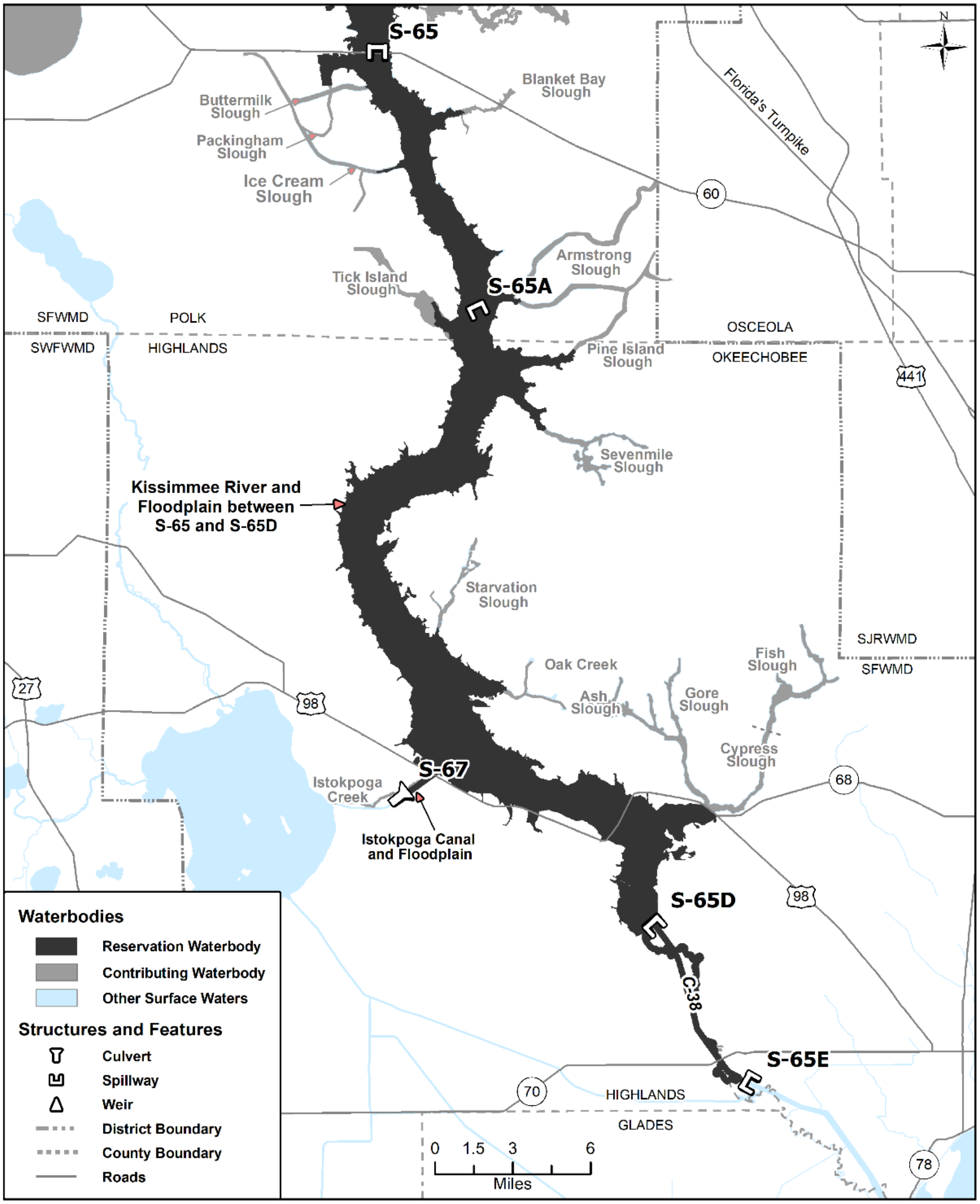


Figure 3-4. Kissimmee River reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

As depicted in **Figure 3-4**, numerous contributing waterbodies (tributary systems) discharge surface water to the Kissimmee River and C-38 Canal. On the eastern side of the Kissimmee River/C-38 Canal, contributing waterbodies include Blanket Bay, Armstrong, Pine Island, Sevenmile, Starvation, Ash, Gore, Fish, and Cypress sloughs as well as Oak Creek. On the western side of the Kissimmee River, contributing waterbodies include Packingham, Buttermilk, Ice Cream, and Tick Island sloughs as well as Istokpoga Creek west of the S-67 structure.

Surface water contributions from the KCOL (UCOL and the Headwaters Revitalization Lakes) provide important inflows to the Kissimmee River. To a lesser extent, direct rainfall and runoff from the surrounding watershed within the LKB are sources of water to the Kissimmee River as well. The largest inflow to the Kissimmee River is discharge from the S-65 structure at the southern end of Lake Kissimmee. **Appendix A** contains more information about contributing waterbodies associated with the Kissimmee River.

Channelization of the Kissimmee River reduced the length of the river from a more than 103-mile meandering river channel (166 kilometers (km)) to a relatively straight, almost 56-mile (90-km) long canal from Lake Kissimmee to Lake Okeechobee. Activities associated with the KRRP ultimately will backfill 22 miles (34 km) of the C-38 Canal, re-establish flow to 40 miles (64 km) of river channel, and seasonally inundate almost 25,000 acres (10,100 hectares) of floodplain wetlands (Bousquin et al. 2009).

3.5.2 Headwaters Revitalization Lakes

The approximate landward extent (i.e., boundary) of the Headwaters Revitalization Lakes reservation waterbody (**Figure 3-5**) is the regulated high stage of 54 ft NGVD29 pursuant to the USACE's (1996) HRS. The reservation waterbody includes Lake Kissimmee, Lake Hatchineha, Tiger Lake, Tiger Creek, and Cypress Lake and their interconnecting canals: C-34 (south and north of the S-63A structure), C-35 (south of the S-61 structure), C-36, and C-37. The reservation waterbody also includes Zipprer Canal east of the G-103 structure located downstream of Lake Rosalie, and Jackson Canal south of the G-111 structure.

Contributing waterbodies include Lake Russell, Lower Reedy Creek south of the REED40 structure, Upper Reedy Creek north of the REED40 structure, Bonnet Creek, Lake Marion Creek, Lake Marion, Catfish Creek, Lake Pierce, Zipprer Canal west of the G-103 structure, Lake Rosalie, Weohyakapka Creek, Lake Weohyakapka, Otter Slough, Jackson Canal north of the G-111 structure, Lake Jackson, Parker Hammock Slough, Lake Marian, Fodderstack Slough, and No Name Slough. The northern extent of Bonnet and Upper Reedy creeks, regulated under this rule, terminate at U.S. Highway 192. The western extent of Otter Slough terminates at State Road 60. Parker Hammock Slough is located between Lakes Jackson and Marian. The eastern extent of No Name Slough, located at the southeastern portion of Lake Kissimmee, terminates at the western property boundary of the Three Lakes Wildlife Management Area.

In addition to SAS contributions, direct rainfall, and runoff from the surrounding watershed, the Headwaters Revitalization Lakes reservation waterbodies receive inflow from two other reservation waterbodies that represent the rest of the UCOL: Lake Tohopekaliga and Lake Gentry. Upper and Lower Reedy Creeks and Lake Russell, which provide flows from the northwestern corner of the basin, are collectively major contributing waterbodies to Cypress Lake and Lake Hatchineha. On the west side of the Headwaters Revitalization Lakes reservation waterbodies, there also is flow from Lake Marion via Lake Marion Creek, Lake Pierce via Catfish Creek, and Lake Weohyakapka via Weohyakapka Creek to Lake Rosalie and then to Lake Kissimmee via Zipprer Canal. Flows also come from Tiger Lake via Tiger Creek and Otter Slough. On the east side of the reservation waterbody, there is inflow from Parker Hammock Slough, Lake Marian, Lake Jackson via Jackson Canal, Fodderstack Slough, and No Name Slough. The S-65 structure controls water levels in the Headwaters Revitalization Lakes reservation waterbodies and governs releases from the KCOL to the Kissimmee River.

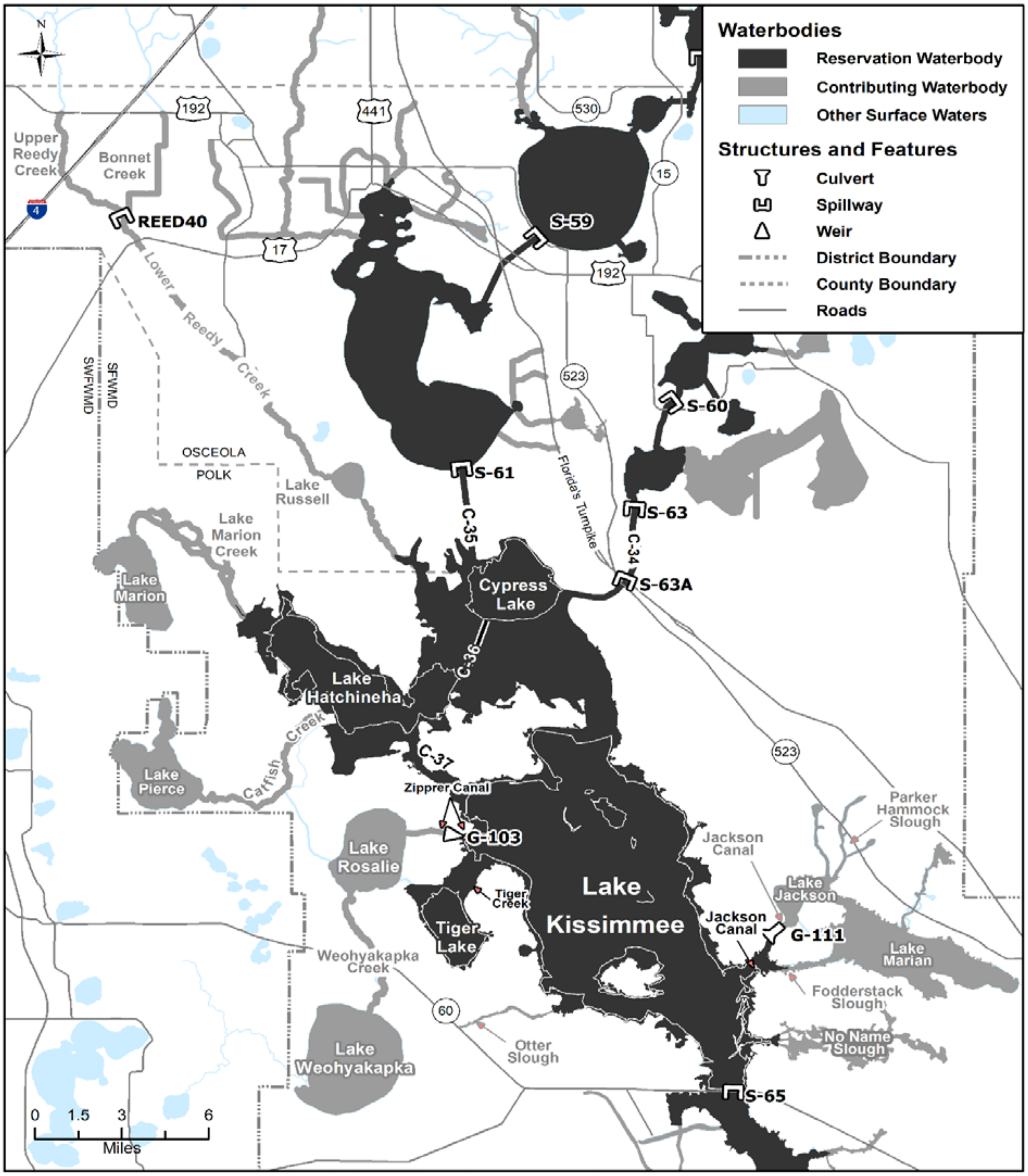


Figure 3-5. Headwater Revitalization Lakes reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

In the future, stages within the Headwaters Revitalization Lakes will be raised in accordance with the new HRS, as approved by USACE, to provide the flows necessary to meet the ecological integrity goals of the KRRP. Most of the land surrounding the Headwaters Revitalization Lakes is in public ownership and managed for conservation. Much of the eastern side of Lake Kissimmee is surrounded by two state-owned parcels, Prairie Lakes and Three Lakes Wildlife Management Area. Lake Kissimmee State Park is located between Lake Rosalie and the western shoreline of Lake Kissimmee.

3.5.3 Upper Chain of Lakes

Table 3-2 provides information on the regulated high stage, surface area, volume, and average or maximum depths of each of the reservation waterbodies in the UCOL. While the lakes vary in size and volume, all are relatively shallow. The regulated high stage was used to define the boundaries of the reservation waterbodies to protect and maintain the wetland habitat used by fish and wildlife.

Table 3-2. Stage, surface area, volume, average depth, and maximum depth for the Upper Chain of Lakes reservation waterbodies.

Waterbody	Regulated High Stage[1] (feet)	Area[2] (acres)	Volume[3] (acre-feet)	Average Depth[4] (feet)	Maximum Depth (feet)
Lakes Hart-Mary Jane	61.0	3,811	25,936	7	22
Lakes Myrtle-Preston-Joel	62.0	2,750	10,014	4	11
Alligator Chain of Lakes	64.0	7,401	57,381	8	32
Lake Gentry	61.5	1,947	16,655	9	19
East Lake Tohopekaliga	58.0	12,898	78,424	6	28
Lake Tohopekaliga	55.0	22,018	145,323	7	13

[1] The extent of the reservation waterbodies in the Upper Chain of Lakes is defined as the upper elevation of the stage regulation schedule (in NGVD29) approved by the United States Army Corps of Engineers.
[2] Surface area is at the upper elevation of the stage regulation schedule.
[3] Volume was calculated from stage storage tables.
[4] Average depth was calculated as volume divided by surface area.

3.5.3.1 Lakes Hart-Mary Jane

The approximate extent of the Lakes Hart-Mary Jane reservation waterbody (**Figure 3-6**) is defined by the regulated high stage of 61 ft NGVD29, pursuant to USACE's lake regulation schedule. The Lakes Hart-Mary Jane reservation waterbody includes Lake Hart, Lake Mary Jane, and Lake Whippoorwill. In addition to the lakes proper, the reservation waterbody includes the Whippoorwill, C-29, C-29A (north of the S-62 structure), and C-30 (north of the S-57 structure) canals. The canal features serve as direct hydrologic connections to Lakes Hart and Mary Jane for conveyance of water through the system. Lake Whippoorwill connects directly to the west side of Lake Hart via the Whippoorwill Canal. As there is no structural divide, Lake Whippoorwill and Whippoorwill Canal are considered part of the Lakes Hart-Mary Jane reservation waterbody.

The Lake Hart-Mary Jane reservation waterbody receives inflow from the Lakes Myrtle-Preston-Joel reservation waterbody via the C-30 Canal (**Figure 3-6**). It also receives water from the SAS, direct rainfall, and runoff from the surrounding watershed. The Disston Canal connects to the northeast corner of Lake Mary Jane and continues northeast for approximately 4 miles to connect to the Econlockhatchee River in the St. John's Water Management District. The direction of flow varies although flow quantities are not significant in either direction.The outlet from the Lakes Hart-Mary Jane reservation waterbody is the S-62 structure, located at the southern end of Lake Hart, which controls water levels in Lakes Hart, Mary Jane, and Whippoorwill. Water from the lakes is discharged into the C-29A Canal and conveyed to the East Lake Tohopekaliga reservation waterbody. There are no contributing waterbodies associated with this reservation waterbody.

Rural residential development occurs along a portion of the shoreline of these lakes. South of the C-29 Canal, between Lakes Hart and Mary Jane, are parts of Orange County's Moss Park and the Split Oak Forest Wildlife and Environmental Area.

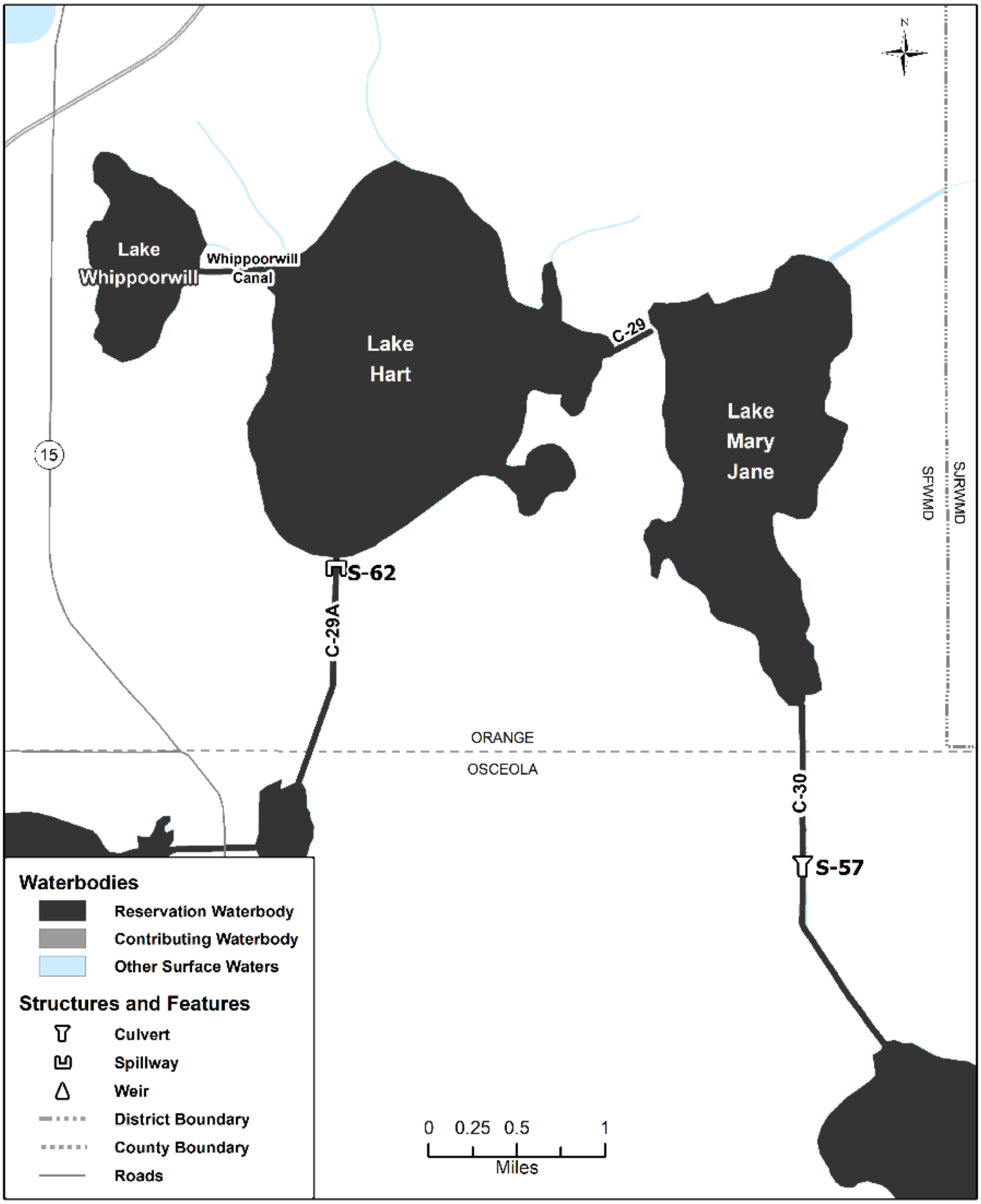
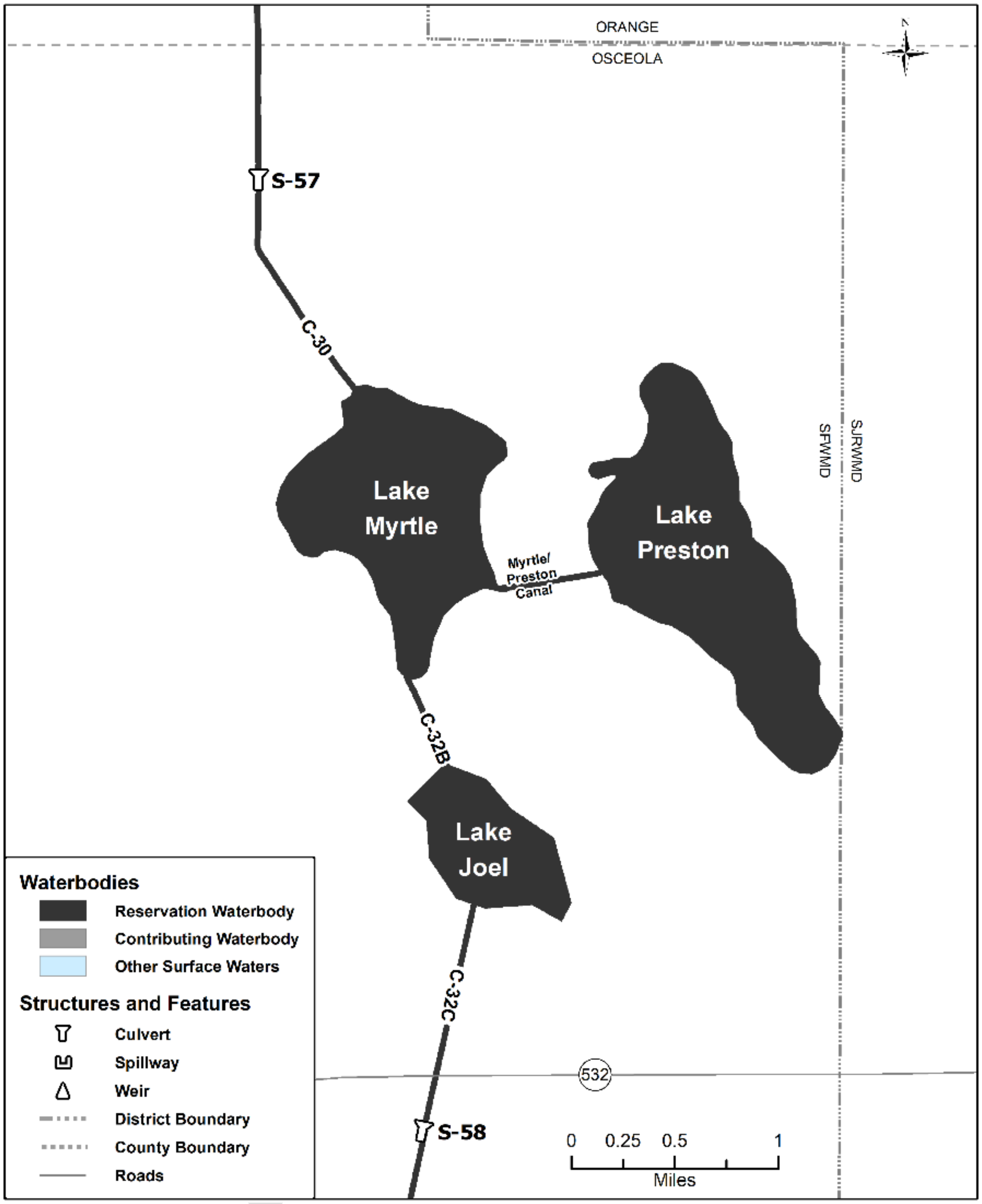


Figure 3-6. Lakes Hart-Mary Jane reservation waterbody (no contributing waterbodies present). Unlabeled waterbodies in this figure are not included in this reservation waterbody group.

3.5.3.2 Lakes Myrtle-Preston-Joel

The approximate landward extent of the Lakes Myrtle-Preston-Joel reservation waterbody (**Figure 3-7**) is defined by the regulated high stage of 62 ft NGVD29, pursuant to the USACE's lake regulation schedule. The Lakes Myrtle-Preston-Joel reservation waterbody includes Lake Myrtle, Lake Preston, and Lake Joel. In addition to the lakes proper, the reservation waterbody includes the C-30 (south of the S-57 structure), C-32B, C-32C (north of the S-58 structure), and Myrtle-Preston canals. These canals provide a direct hydrologic connection between Lakes Myrtle, Preston, and Joel.


ORANGE
OSCEOLA
S-57
C-30
Lake Myrtle
Lake Preston
Myrtle/ Preston Canal
SFWMD
SJRWMD
C-32B
Lake Joel
C-32C
532
S-58
0 0.25 0.5 1
Miles
Waterbodies
Reservation Waterbody
Contributing Waterbody
Other Surface Waters
Structures and Features
Culvert
Spillway
Weir
District Boundary
County Boundary
Roads

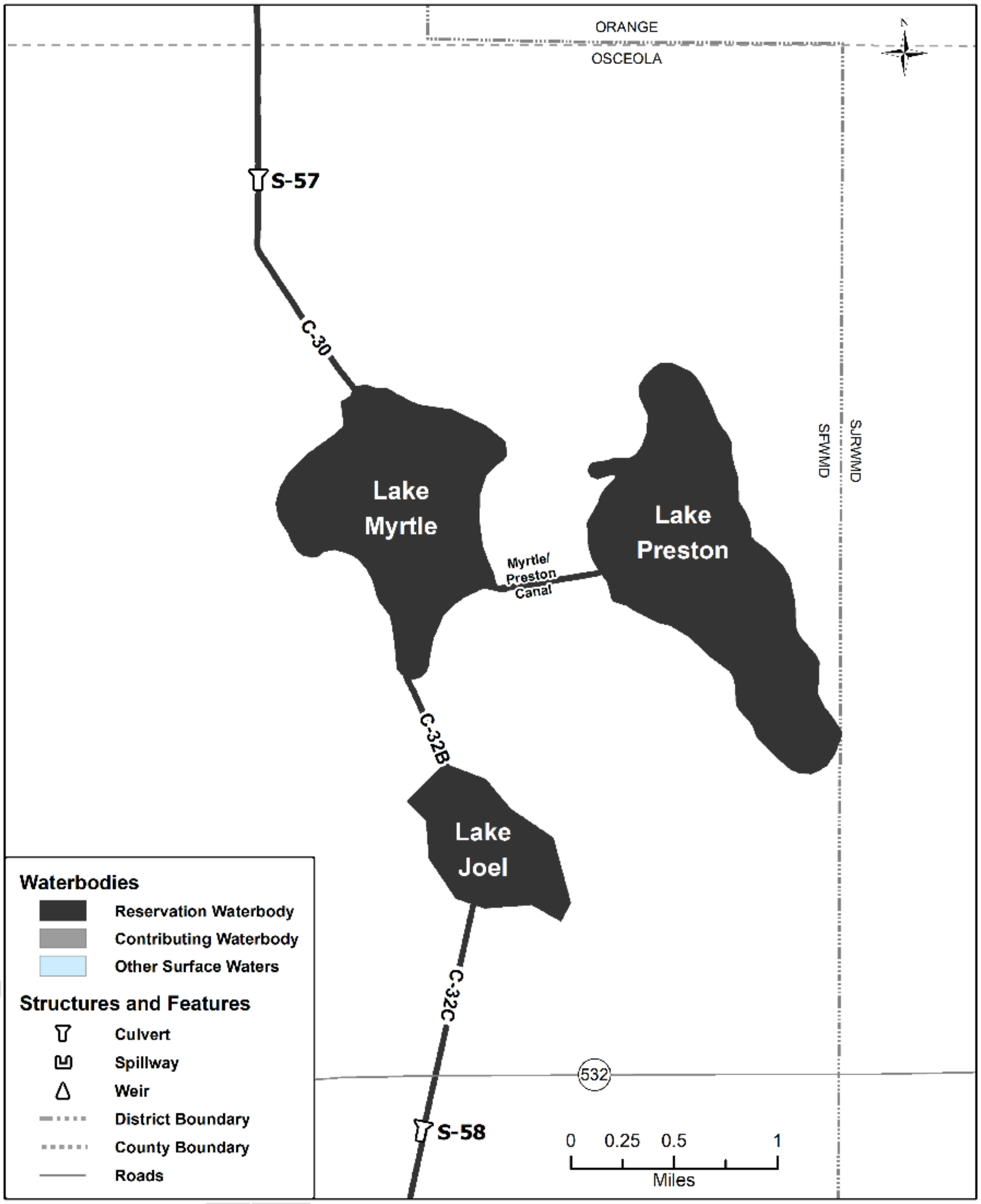


Figure 3-7. Lakes Myrtle-Preston-Joel reservation waterbodies (no contributing waterbodies present). Unlabeled waterbodies in this figure are not included in this reservation waterbody group.

The main sources of water to the Lakes Myrtle-Preston-Joel reservation waterbody are the SAS, direct rainfall, and runoff from the surrounding watershed. The Lakes Myrtle-Preston-Joel reservation waterbody can receive water from the Alligator Chain of Lakes via the S-58 structure. However, this structure is rarely used and generally serves as a divide structure in the system, with water north of the S-58 structure flowing northward through Lakes Myrtle-Preston-Joel and water south of the structure flowing southward through the system.

Downstream from Lake Myrtle in the C-30 Canal, the principal outlet from the Lakes Myrtle-Preston-Joel reservation waterbody is the S-57 structure, which controls water levels in Lakes Myrtle-Preston-Joel and regulates outflow through the C-30 Canal toward Lake Mary Jane. When water levels in Lakes Myrtle-Preston-Joel are higher than the Alligator Chain of Lakes, water may flow through the S-58 structure into Trout Lake. Ordinarily, this movement of water is prevented by higher water levels in the Alligator Chain of Lakes. ~~There are no contributing waterbodies associated with this reservation waterbody.~~

The Lakes Myrtle-Preston-Joel watershed is relatively small but approximately nine times the area of the lakes themselves.

Under normal conditions there are no contributing waterbodies associated with this reservation waterbody. However, under extreme rainfall events, the Lake Conlin watershed to the south has been observed to discharge into Lakes Myrtle-Preston-Joel. For example, a rainfall event on Oct. 7-9, 2011 delivered over 9 inches of rain to the watershed while Hurricane Irma on Sep. 10-11, 2017 delivered approximately 8 inches to the watershed. Both of these events induced conditions where excess runoff from the Lake Conlin watershed entered the Myrtle-Preston-Joel system (primarily through northward flow that entered into the southern portions of Lakes Joel and Preston) and created flooding throughout the Myrtle-Preston-Joel system (see **Figure 3-8**).

The Lake Conlin watershed is an upland swamp and lake system that, under normal conditions, primarily discharges to the northeast into the Econlockhatchee swamp, which continues to the Econlockhatchee River and is within the St. John's River Water Management District. However, under extreme rainfall events like those described above, stages in the Lake Conlin watershed rise to a point where discharges occur to the northwest through a series of culverts under Nova road. That discharge enters the southern region of the Myrtle-Preston-Joel system. When these excessive stages occur, the discharge that enters the Myrtle-Preston-Joel system is representative of runoff from both the Lake Conlin watershed and the Econlockhatchee River Swamp watershed. As a result of the 2011 event, the Myrtle-Preston-Joel and Lake Conlin region has been studied in detail by the District and other public and private stakeholders, which included field trips, helicopter reconnaissance flights, and additional watershed modeling, and resulted in several technical reports. While there is consensus that the Lake Conlin watershed contributes to the Myrtle-Preston-Joel system under extreme events, the watershed dynamics are complex and the available data does not allow for an exact determination of the frequency and magnitude of those contributing events. Additional monitoring and study would be required to more precisely define the conditions that yield Lake Conlin contributions to Myrtle-Preston-Joel.

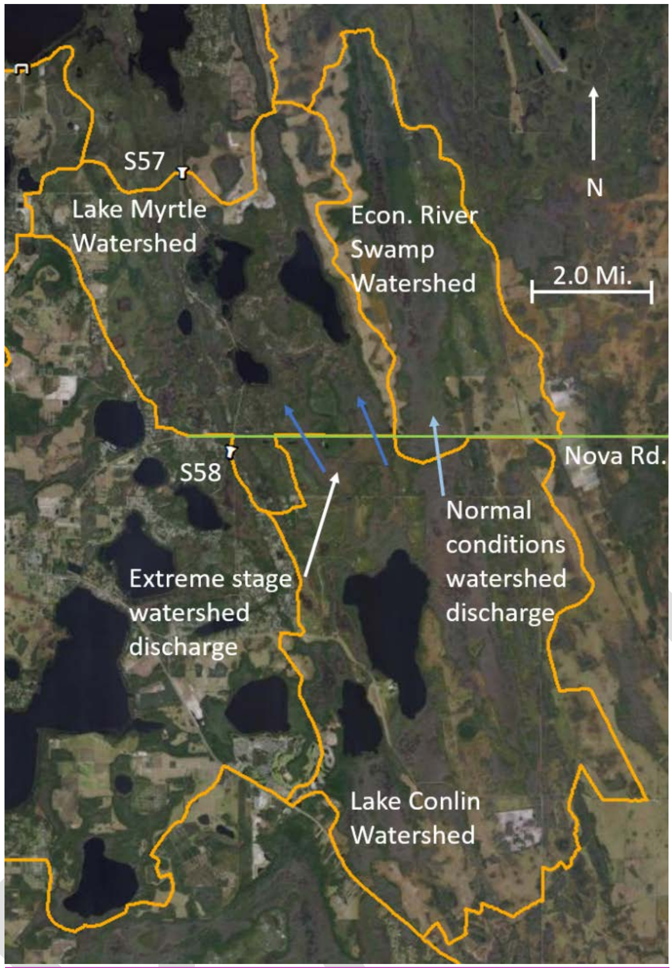


Figure 3-8. The Lake Conlin and Econlockhatchee River Swamp watersheds as upstream areas to the Lake Myrtle watershed under extreme stage conditions.

The shorelines of these lakes are within Osceola County's Urban Growth Area and are in the process of being converted into residential and mixed uses. Several environmental resource and water use permits have been issued for a development called Sunbridge.

3.5.3.3 Alligator Chain of Lakes

The approximate extent of the Alligator Chain of Lakes reservation waterbody (**Figure 3-~~8~~9**) is defined by the regulated high stage of 64 ft NGVD29, pursuant to the USACE's lake regulation schedule. The Alligator Chain of Lakes reservation waterbody includes Lake Center, Coon Lake, Trout Lake, Lake Lizzie, Live Oak Lake, Sardine Lake, Alligator Lake, and Brick Lake. In addition to the lakes proper, the reservation waterbody includes multiple canals: C-32C south of the S-58 structure, C-32D, Center-Coon, C-32F, C-32G, Live Oak, Sardine, Brick, and C-33 north of the S-60 structure. Live Oak Lake and Sardine Lake connect directly to the west side of Alligator Lake via the Live Oak and Sardine canals. As there are no control structures within these canals, Live Oak and Sardine Lakes are considered part of the Alligator Chain of Lakes reservation waterbody. All these waterbodies have direct connections to the upstream, downstream, or lateral waterbodies by means of a canal. Buck Lake and Buck Slough are contributing waterbodies because their hydrologic connection to Alligator Lake occurs through an ephemeral slough system rather than directly through a canal.

The sources of water to the Alligator Chain of Lakes reservation waterbody are the SAS, direct rainfall, and runoff from the surrounding watershed. Some inflow from the Lakes Myrtle-Preston-Joel reservation waterbody is possible under certain conditions.

Located at the southern end of Alligator Lake, the primary outlet from the Alligator Chain of Lakes is the S-60 structure, which controls water levels in all the Alligator Chain of Lakes waterbodies and releases water to Lake Gentry. Some surface water releases can be made from the north end of the Alligator Chain of Lakes reservation waterbody through the S-58 structure to the Lakes Myrtle-Preston-Joel reservation waterbody. Extensive residential development exists along some of the shorelines in the Alligator Chain of Lakes.

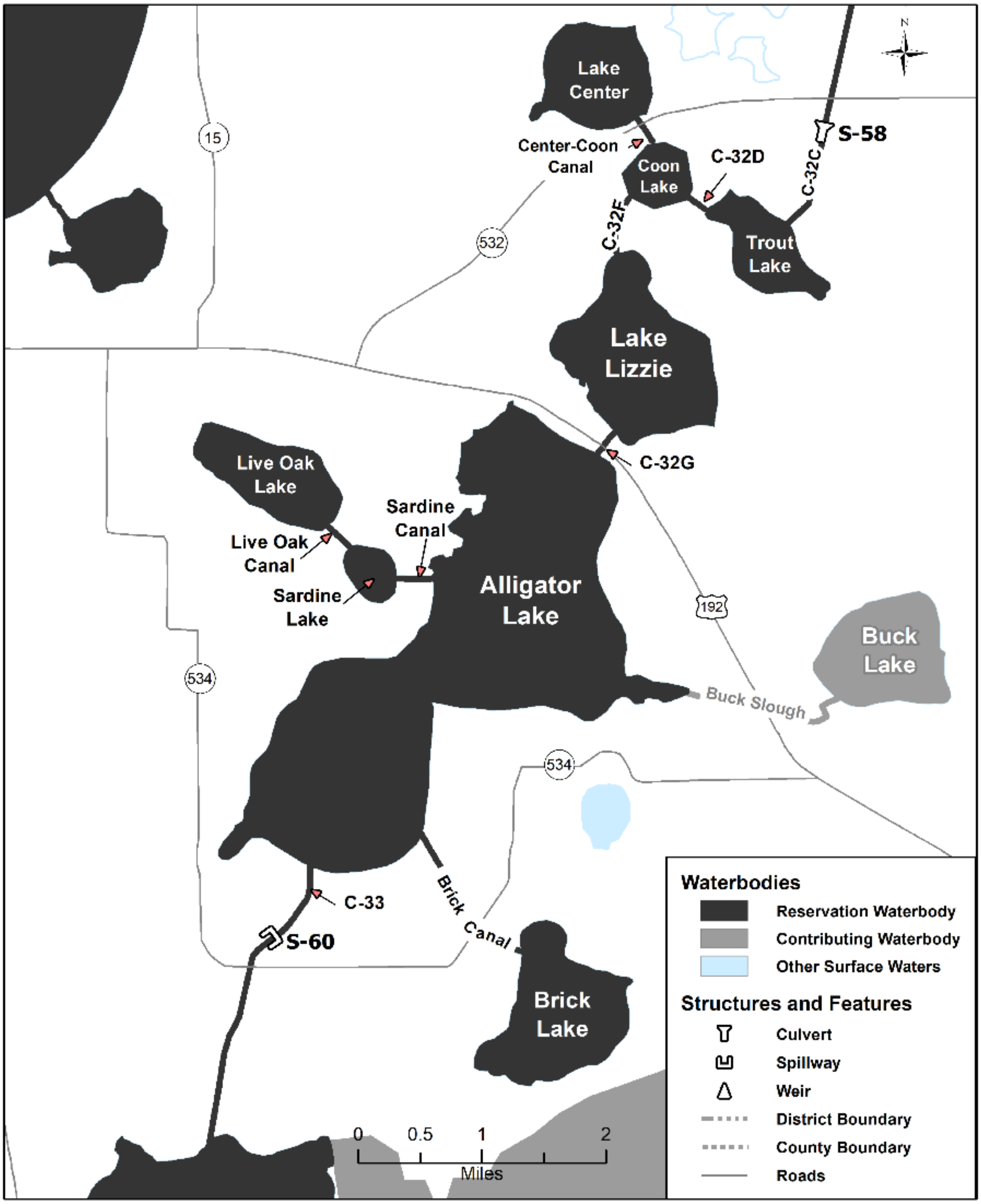
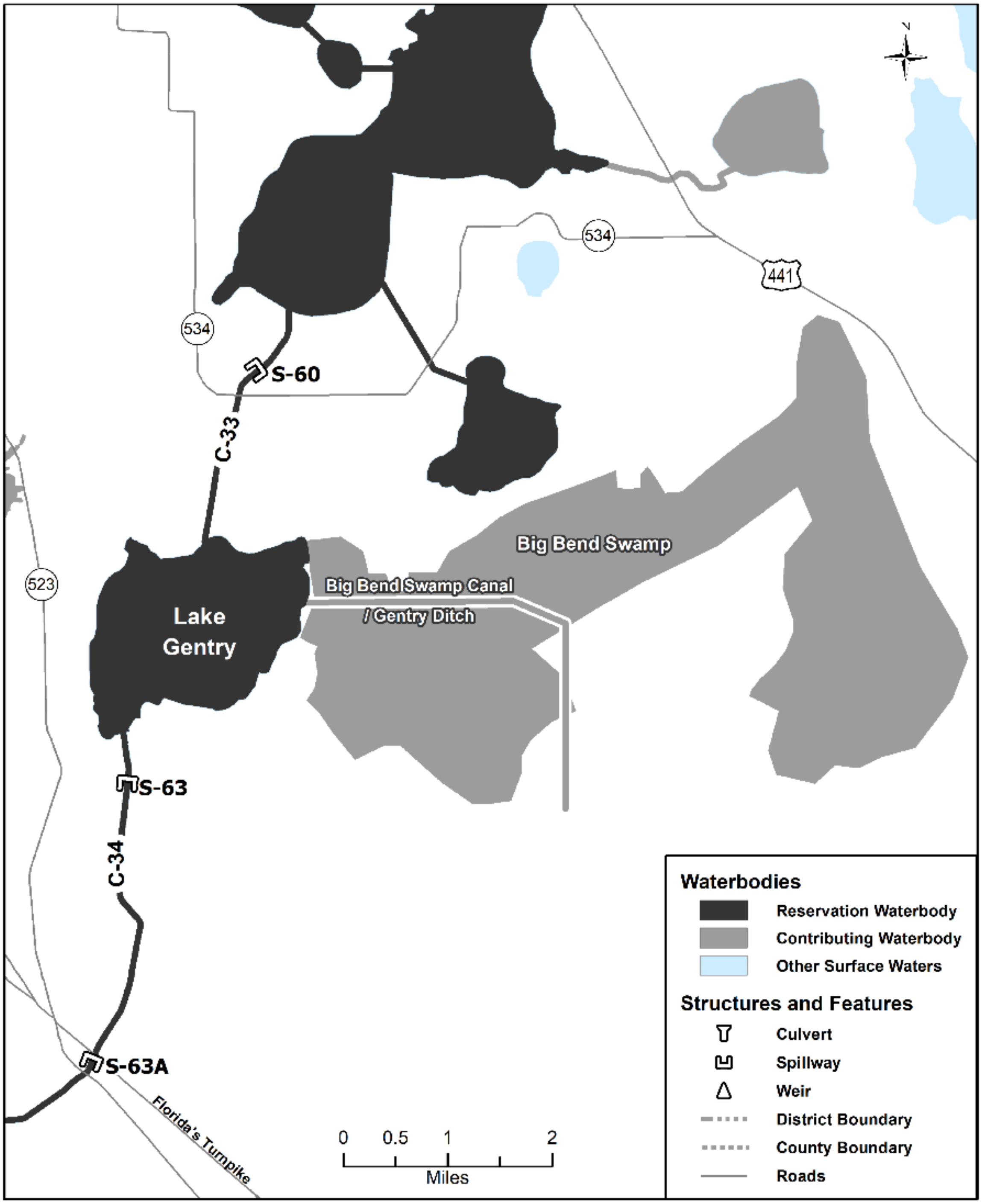


Figure 3-~~8~~9. Alligator Chain of Lakes reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

3.5.3.4 Lake Gentry

The approximate landward extent of the Lake Gentry reservation waterbody (**Figure 3-~~9~~10**) is defined by the regulated high stage of 61.5 ft NGVD29, pursuant to USACE's lake regulation schedule. The reservation waterbody includes a single lake - Lake Gentry. In addition to the lake proper, the reservation waterbody includes the C-34 Canal north of the S-63 structure and the C-33 Canal south of the S-60 structure.


Big Bend Swamp
Big Bend Swamp Canal / Gentry Ditch
Lake Gentry
S-60
C-33
S-63
C-34
S-63A
Florida's Turnpike
534
534
441
523
0
0.5
1
2
Miles
Waterbodies
Reservation Waterbody
Contributing Waterbody
Other Surface Waters
Structures and Features
Culvert
Spillway
Weir
District Boundary
County Boundary
Roads

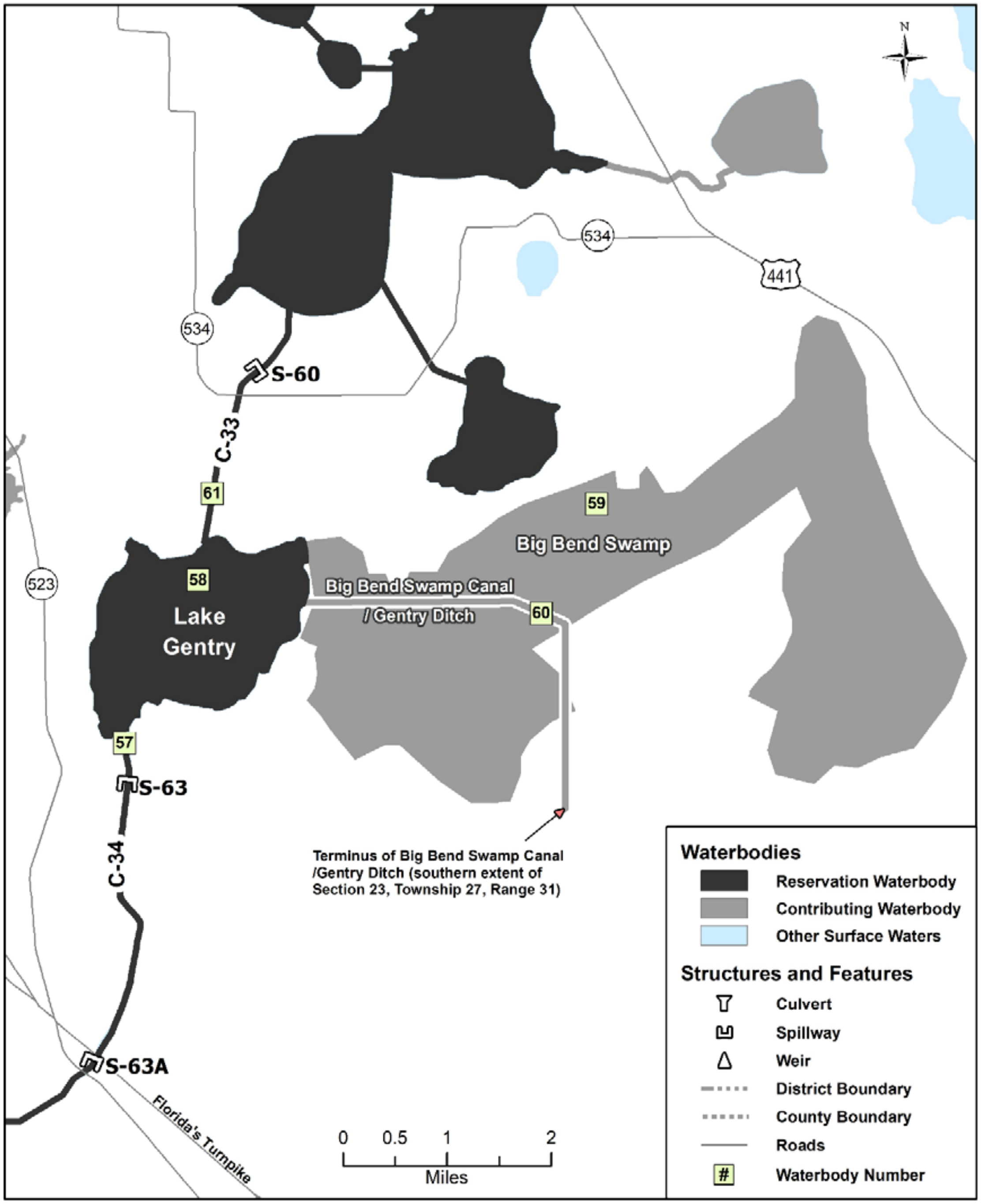


Figure 3-~~9~~10. Lake Gentry reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

Big Bend Swamp and Big Bend Swamp Canal/Gentry Ditch are contributing waterbodies that drain into the east side of Lake Gentry. Big Bend Swamp Canal/Gentry Ditch drains both wetland and uplands downstream to Big Bend Swamp. The southeastern extent of Big Bend Swamp Canal/Gentry Ditch terminates at the line between Sections 23 and 26, Township 27, Range 31.

In addition to SAS contributions, direct rainfall, and runoff from the surrounding watershed, Lake Gentry receives surface water inflows from the Alligator Chain of Lakes reservation waterbody through the C-33 Canal and from Big Bend Swamp along the eastern shore of the lake.

Water levels in Lake Gentry are regulated by the S-63 structure, located approximately 2,900 ft downstream of the lake on the C-34 Canal. This structure also controls releases from Lake Gentry into Lake Cypress via a second structure, S-63A, which is approximately halfway between the S-63 structure and Lake Cypress. The S-63A structure is used to step-down stages in the C-34 Canal. The shoreline of Lake Gentry is relatively undeveloped, with only some rural lakeside residences.

3.5.3.5 East Lake Tohopekaliga

The approximate landward extent of the East Lake Tohopekaliga reservation waterbody (**Figure 3-~~10~~11**) is defined by the regulated high stage of 58 ft NGVD29, pursuant to USACE's lake regulation schedule. The East Lake Tohopekaliga reservation waterbody includes East Lake Tohopekaliga, Lake Runnymede, Fells Cove, and Ajay Lake. In addition to the lakes proper, the reservation waterbody includes multiple canals: C-29A south of the S-62 structure, C-29B, Runnymede, and C-31 northeast of the S-59 structure. Ajay Lake and Fells Cove are upstream of East Lake Tohopekaliga and directly connected through the canals mentioned above. Lake Runnymede is southeast of East Lake Tohopekaliga and directly connected to the lake by the Runnymede Canal. As there is no structural divide, Lake Runnymede and Runnymede Canal are considered part of the East Lake Tohopekaliga reservation waterbody. The reservation waterbody does not include the stormwater management lakes located along the southern shoreline of East Lake Tohopekaliga within the City of St. Cloud.

In addition to SAS contributions, direct rainfall, and runoff from the surrounding watershed, there are two major inflows into East Lake Tohopekaliga. The first is Boggy Creek, which enters the lake from the northwestern corner. The second is Ajay Lake via the East Tohopekaliga Canal (C-29A Canal) from the Lakes Hart-Mary Jane reservation waterbody. Minor inflow occurs from Lake Runnymede on the southeast shore.

The S-59 structure, located at the southern end of East Lake Tohopekaliga, controls water levels in East Lake Tohopekaliga, Fells Cove, Ajay Lake, and Lake Runnymede. The S-59 structure releases water into the C-31 (St. Cloud) Canal, which enters the Lake Tohopekaliga reservation waterbody through Goblet's Cove.

Extensive residential development exists along the shoreline of these lakes. It is most intensely developed along the south shore of East Lake Tohopekaliga, where the City of St. Cloud is located. More recent residential development has occurred in the northeastern portion of this reservation waterbody, around Fells Cove.

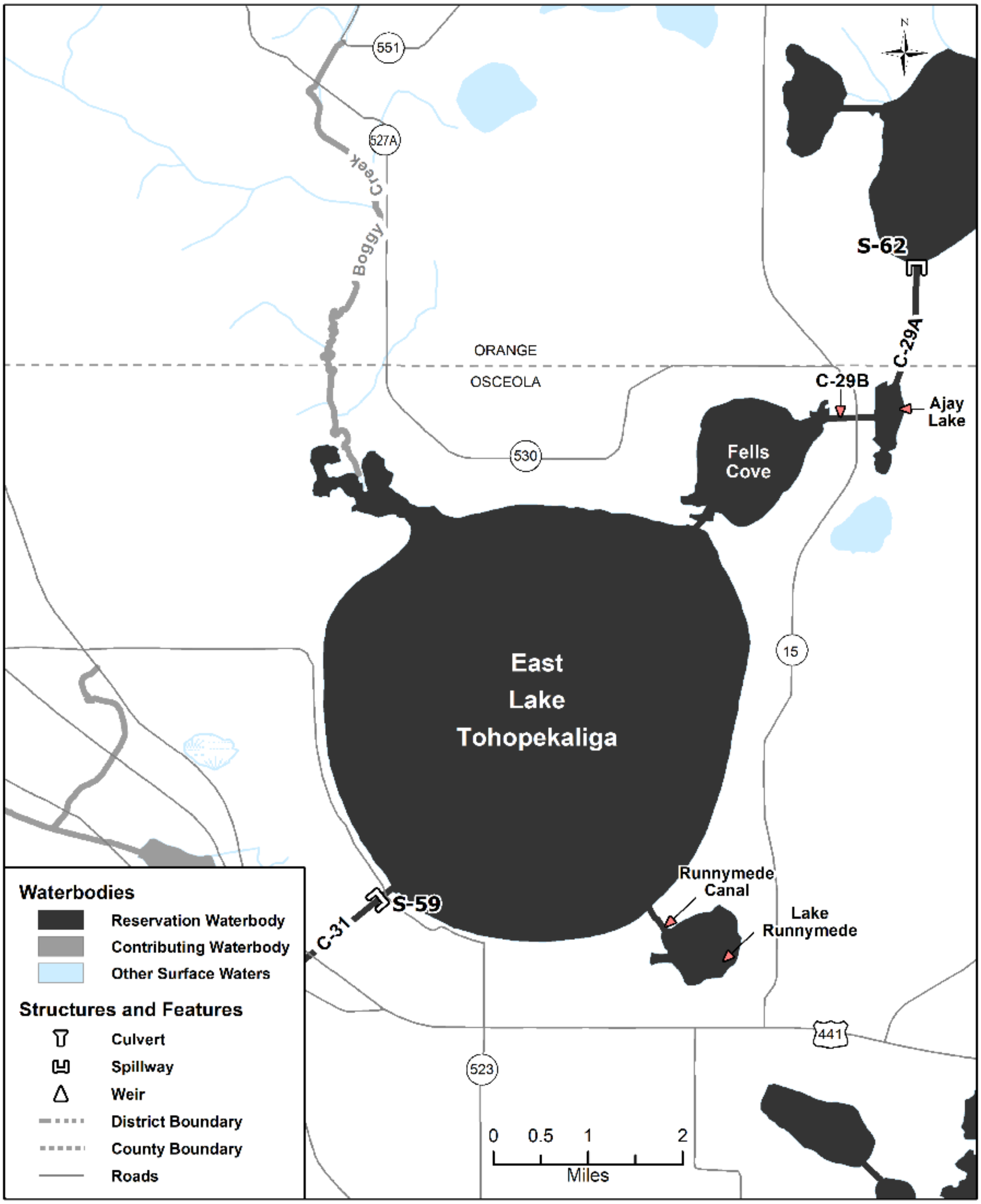
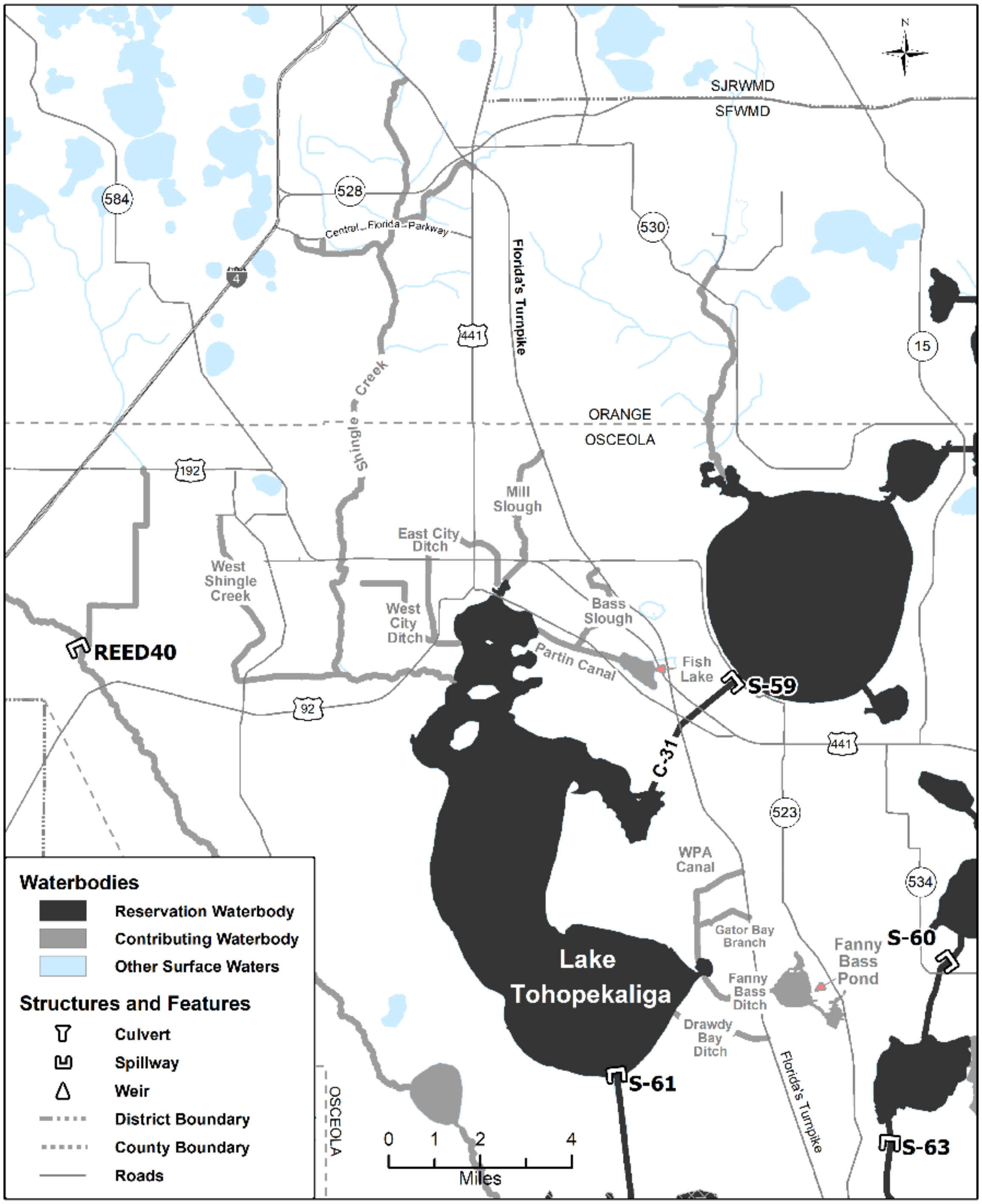


Figure 3-~~10~~11. East Lake Tohopekaliga reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

3.5.3.6 Lake Tohopekaliga

The approximate landward extent of the Lake Tohopekaliga reservation waterbody (**Figure 3-~~11~~12**) is defined by the regulated high stage of 55 ft NGVD29, pursuant to USACE's lake regulation schedule. The Lake Tohopekaliga reservation waterbody is the largest reservation waterbody within the UCOL, covering approximately 22,000 acres (8,900 hectares; **Table 3-2**). The reservation waterbody also includes the C-31 Canal southwest of the S-59 structure.


SJRWMD
SFWMD
584
528
Central Florida Parkway
4
441
Florida's Turnpike
530
15
Shingle Creek
ORANGE
OSCEOLA
192
Mill Slough
East City Ditch
West Shingle Creek
West City Ditch
Bass Slough
Partin Canal
Fish Lake
S-59
REED40
92
C-31
441
523
WPA Canal
534
Gator Bay Branch
Fanny Bass Ditch
Fanny Bass Pond
S-60
Lake Tohopekaliga
Drawdy Bay Ditch
S-61
S-63
OSCEOLA
0 1 2 4
Miles
Waterbodies
Reservation Waterbody
Contributing Waterbody
Other Surface Waters
Structures and Features
Culvert
Spillway
Weir
District Boundary
County Boundary
Roads

818

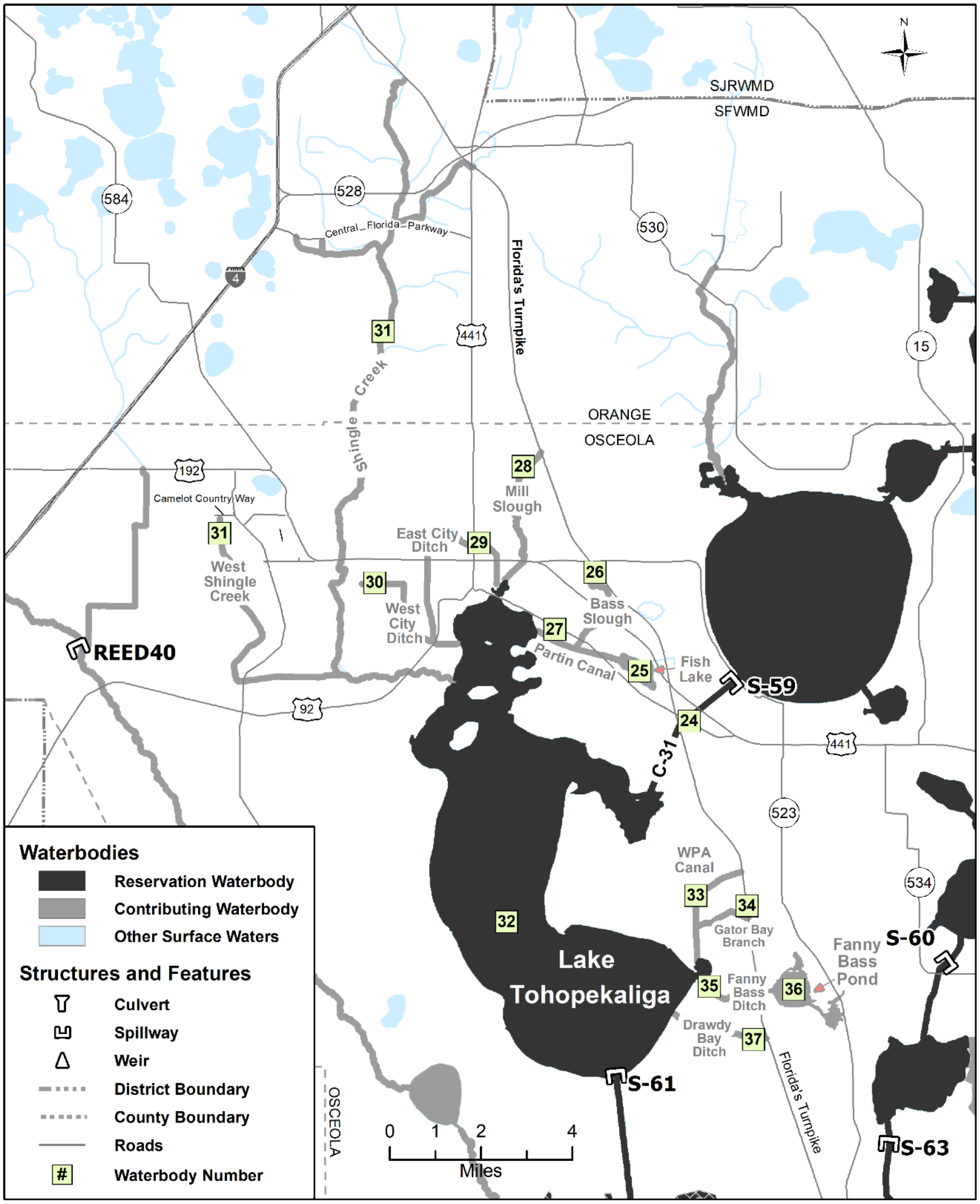


Figure 3-~~11~~12. Lake Tohopekaliga reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

In addition to SAS contributions, direct rainfall, and runoff from the surrounding watershed, the Lake Tohopekaliga reservation waterbody receives inflow from the East Lake Tohopekaliga reservation waterbody via the C-31 Canal. There also are major inflows from a major contributing waterbody—Shingle Creek, which flows from the City of Orlando southward and enters Lake Tohopekaliga at its northern end. Additional contributing waterbodies include Fish Lake, Mill Slough, West Shingle Creek, Fanny Bass

Pond, Bass Slough, Partin Canal, East City Ditch, West City Ditch, Works Progress Administration Canal, Gator Bay Branch, Fanny Bass Ditch, and Drawdy Bay Ditch. Some of these contributing waterbodies discharge to this reservation waterbody via existing channelized conveyance systems. The northern extent of Shingle Creek, Mill Slough, Bass Slough, Works Progress Administration Canal, Drawdy Bay Ditch, and Gator Bay Branch contributing waterbodies terminate at Florida's Turnpike. The northwestern branch of Shingle Creek ends at the Central Florida Parkway. West Shingle Creek terminates at Camelot Country Way. The eastern extent of the Fanny Bass Pond wetland complex terminates at County Road 523. The S-61 structure controls water levels in the Lake Tohopekaliga reservation waterbody and releases water into the C-35 (Southport) Canal, which flows into Lake Cypress.

The City of Kissimmee is located on the northwest shore of Lake Tohopekaliga. Extensive residential and commercial development exists around much of the lake. The surrounding areas are within the Osceola County Urban Growth Area.

CHAPTER 4: FISH AND WILDLIFE RESOURCES AND HYDROLOGIC REQUIREMENTS

4.1 Kissimmee River and Headwaters Revitalization Lakes

Following completion of the C-38 Canal in 1971 by the C&SF Project, numerous state and federal planning and feasibility studies (USACE 1991, 1996), demonstration projects (e.g., Loftin et al. 1990a; Toth 1991, 1993), modeling efforts (e.g., Loftin et al. 1990b), legislative actions, appropriations, and other actions led to the authorization of the KRRP. The *Central and Southern Florida Project Final Integrated Feasibility Report and Environmental Impact Statement Environmental Restoration Kissimmee River, Florida* (USACE 1991) describes the recommended plan for the KRRP, including an environmental impact statement (EIS) that addresses the National Environmental Policy Act, Endangered Species Act, and other concerns. The United States Fish and Wildlife Service (USFWS) *Fish and Wildlife Coordination Act Report on the Kissimmee River Restoration Project* is included in the USACE (1991) report as Annex E. In 1992, the United States Congress passed the Water Resources Development Act (Public Law 102-580). Section 101 of the act authorizes the KRRP and its Headwaters Revitalization components, including the HRS. The KRRP represents the culmination of considerable public participation and investment. The final cost to restore the Kissimmee River currently is estimated at almost $800 million. The project is a partnership between the SFWMD and USACE and is equally cost-shared between the state and federal governments.

An integral operational component of the KRRP was the development of a new regulation schedule for the S-65 structure at the outlet from the Headwaters Revitalization Lakes to the Kissimmee River. The new HRS was designed to provide the flows necessary to meet the KRRP's hydrologic and ecological integrity goals. The HRS was authorized by Congress in 1992 as part of the Water Resources Development Act and the KRRP. In 1994, the USFWS completed the *Fish and Wildlife Coordination Act Report on Kissimmee Headwaters Lakes Revitalization Plan* (USFWS 1994) pursuant to the requirements of the Fish and Wildlife Coordination Act and the Endangered Species Act of 1973. The technical analysis associated with the HRS was completed in April 1996 and is described in the *Central and Southern Florida Project, Kissimmee River Headwaters Revitalization Project: Integrated Project Modification Report and Supplement to the Final Environmental Impact Statement* (USACE 1996). In November 1996, the USACE issued its record of decision approving the recommended plan, including the construction plan and schedule change, described in USACE (1996), finding it "to be economically justified, in accordance with environmental statutes, and in the public interest."

The HRS will increase storage in the Headwaters Revitalization Lakes to retain water during wetter periods for release, as needed, to the river in order to replicate historical flow characteristics. A major component of the state's investment in the project was the acquisition of land to create additional storage to allow natural inundation of the Kissimmee River floodplain.

Reconstruction of the river has been occurring in phases since the late 1990s. At the time of this writing, the physical project is expected to be complete in December 2020. Until KRRP construction is complete, the HRS cannot be fully implemented. Following completion of Phase I construction in 2001, an interim regulation schedule for the S-65 structure has been used to provide partial floodplain inundation and restore habitat in the reconnected river channels. This interim schedule will continue to be used until construction is complete and the HRS can be fully implemented.

Fish, wildlife, and habitat responses within the KRRP areas and unrestored control areas are being tracked by the SFWMD's Kissimmee River Restoration Evaluation Program using river/floodplain restoration performance measures. Monitoring results for the river channel and floodplain have been reported annually

in the *South Florida Environmental Report* since 2005 as new data become available; Koebel et al. (2020) contains the most recent monitoring data and trends. Responses also were summarized in a special section of the international peer-reviewed journal *Restoration Ecology* in 2014, including results for hydrology (Anderson 2014a), river channel geomorphic characteristics of habitat (Anderson 2014b), dissolved oxygen (Colangelo 2014), vegetation in the river channel (Bousquin and Colee 2014) and floodplain (Spencer and Bousquin 2014), aquatic macroinvertebrates (Koebel et al. 2014), fish (Jordan and Arrington 2014), and wading birds and waterfowl (Cheek et al. 2014). To date, ecological responses to the first three construction phases have been most pronounced in the river channel. Floodplain metrics are expected to improve dramatically following implementation of the HRS.

To fully capitalize on federal and state authorizations and associated funding, it is essential to ensure the water needed to achieve hydrologic improvements to meet the KRRP's ecological integrity goal is reserved for its intended use (including protection of fish and wildlife) and not allocated to consumptive uses. As a result, the SFWMD initiated the Water Reservation rule development process for the Kissimmee River and Chain of Lakes.

This chapter is an update of the material from the 2009 draft technical document (SFWMD 2009) for the Kissimmee River and Chain of Lakes Water Reservations. The technical foundation is the same and, therefore, has been peer reviewed (**Appendix E**).

4.2 Kissimmee River Fish and Wildlife Resources and Hydrologic Requirements

This section and **Appendix F** describe the vegetation and fish and wildlife resources that occur in the Kissimmee River and floodplain. This section includes fish and bird communities; **Appendix F** includes plant communities, amphibians and reptiles, and mammals as well as detailed species lists for all animal taxa described here and in **Appendix F**. The focus of these descriptions is on higher taxa that depend on the river and floodplain to meet their reproductive, feeding, and other survival needs for one or more life cycle stages. Hydrologic requirements of the major floodplain vegetation groups as well as fish and wildlife also are discussed here and in **Appendix F**. Additional information on Kissimmee River fish and wildlife and associated habitat resources of the Kissimmee River and floodplain can be found in USACE (1991) Sections 9.8.3 and 9.8.4 and Annex D; Koebel et al. (2014; invertebrates); Cheek et al. (2014; waterbirds); Spencer and Bousquin (2014; floodplain vegetation); Bousquin and Colee (2014; river channel vegetation); Colangelo (2014; dissolved oxygen); Jordon and Arrington (2014; piscivorous fish); Anderson et al. (2005); Koebel and Bousquin (2014); and Bousquin et al. (2005b).

Important native fish and wildlife resources were associated with the Kissimmee River prior to its channelization. Many species of fish and wildlife declined in abundance or disappeared from the area after the river was channelized and its floodplain drained (Toth 1993). Monitoring conducted by the SFWMD's Kissimmee River Restoration Evaluation Program tracks the fish and wildlife currently associated with the Kissimmee River and changes occurring during the transition period between the start of construction and future restoration. Since completion of Phase I construction of the KRRP in 2001, which restored flow to an initial 14 miles of river channel, there were increases in the use of the river channel and parts of the floodplain by some fish and wildlife (Bousquin et al. 2007, 2009). These changes, which are consistent with those predicted by Kissimmee River Restoration Evaluation Program performance measures for the river channel (Anderson et al. 2005), demonstrate the linkage between hydrology in the river channel and floodplain and their use by fish and wildlife, which is the basis for the river restoration effort. Less robust changes have occurred on the floodplain compared to the river channel because the project has not yet provided sufficient floodplain inundation. Floodplain recovery is expected after implementation of the HRS with appropriate water management operations.

4.2.1 Kissimmee River Fish

A total of 52 species of fish have been collected from the Kissimmee River and its floodplain (**Appendix F**, Table F-2). Of these species, 39 were reported in the river before channelization (Florida Game and Fresh Water Fish Commission 1957). Although there were significant changes in the structure of the fish community following channelization (described below), only one species, the blackbanded darter (*Percina nigrofasciata*), was lost (Trexler 1995). Six exotic species have invaded or been released into the system since the 1950s. Fish species occurring in the Kissimmee River system represent a range of trophic levels (herbivore, piscivore, omnivore, invertivore, planktivore, and detritivore), consume foods from both aquatic and terrestrial environments (Karr et al. 1986), and serve as a critical link in the energy pathway between primary producers and higher trophic level consumers, including amphibians, reptiles, and birds (Karr et al. 1992, Gerking 1994).

Most fish species in the Kissimmee River use the floodplain for feeding and reproduction (Trexler 1995). This is shown by the guild classification in **Appendix F**, Table F-2. Fifteen native species belong to the Off-channel Specialist Guild, which contains species usually found in off-channel habitats or are limited to non-flowing vegetated waters throughout their life. Many of these species are small forage fish, such as mosquito fish (*Gambusia holbrooki*) and the least killifish (*Heterandria formosa*). These fish are important prey for game fish and wading birds foraging on the floodplain. Another 23 native species and 5 exotic species belong to the Off-channel Dependent Guild, whose members require access to or use of off-channel habitats or are limited to non-flowing, vegetated waters for some portion of their life cycle. The 38 native species that depend on an inundated floodplain for some stage in the life cycle constitute 74% of the species currently in the river.

4.2.1.1 Hydrologic Requirements of Kissimmee River Fish

The species that compose riverine fish communities are adapted to seasonally fluctuating flow (Poff and Allan 1995, Poff et al. 1997) and use inundated floodplain habitat during the seasonal flood pulse of water onto and off the floodplain, a pattern seen in other medium to large rivers (Welcomme 1979, Junk et al. 1989). Before channelization, the Kissimmee River experienced a flood pulse that began with high flows near the end of the summer-fall wet season. The pulse inundated much of the floodplain for an extended period of time during most years (Toth et al. 2002). The pulse had a gradual recession over the dry season, with lower flow continuing until the next flood event.

Seasonality, an important aspect of the flood pulse in the Kissimmee River, is reflected in the timing of the maximum and minimum average monthly flows and a gradual transition from the maximum to the minimum (recession). If the timing of this seasonal pattern is notably altered, organisms may not be able to reproduce, survival of progeny may suffer, and other life-history requirements may not be met. In Florida rivers, Bonvechio and Allen (2005) found that recruitment of sunfish (Centrarchidae) was affected by the timing of high flows. High flows during or soon after spawning could damage nests or displace offspring. High flows before spawning in the pre-regulated system allowed adults access to the floodplain where more invertebrate prey would be available. Three or more consecutive years with disrupted seasonality of flow could reduce the abundance of sunfish (Bonvechio and Allen 2005).

Off-channel dependent fish need seasonally high water levels above the banks of the river channel to access the floodplain for reproduction and foraging (Scheaffer and Nickum 1986, Winemiller and Jepsen 1998; **Figure 4-1**). For example, largemouth bass (*Micropterus salmoides*) require water depths of 2 to 4 ft (60 to 120 cm) for nest construction, and their fry require densely vegetated habitat as refugia (**Appendix F**, Table F-2). The time required for this process is as follows: nest construction and spawning, 1 to 3 days; egg incubation, 3 to 4 days; time for eggs to hatch and for hatchlings to fully develop as fry (swim-up), 5 to 8 days; parental guarding of fry, 7 to 14 days; and schooling by fry after abandonment, 26 to 31 days.

Therefore, bass require appropriate inundation characteristics for 42 to 60 days for a single spawning event that may occur between December and May. In addition to largemouth bass, other off-channel dependent fish taxa spawn throughout the year, especially several ecologically and sociopolitically significant game fish (**Appendix F**, Table F-2). For instance, bluegill (*Lepomis macrochirus*) and redear sunfish (*Lepomis microlophus*) are known to spawn in Florida between February and October, whereas spotted sunfish (*Lepomis punctatus*) spawn between May and November (Carlander 1977). When all centrarchid taxa are considered (including largemouth bass), spawning may occur during any month of the year (**Appendix F**, Table F-2).

High water levels are needed to create hydroperiods and water depths to maintain large areas of the Broadleaf Marsh plant community, which provides forage and refuge from predation for early life stages of large-bodied fish (Savino and Stein 1982, Toth 1990, Winemiller and Jepsen 1998). Inundation of the floodplain also creates foraging opportunities by creating habitat for the secondary production of aquatic invertebrates and forage fish (Gladden and Smock 1990, Winemiller and Jepsen 1998). In tropical floodplain rivers, the yield of fish in one year is positively related to the area of floodplain inundated in previous years (Welcomme and Hagborg 1977).

When the floodplain is not inundated, flow is still required to maintain habitat characteristics in the river channel. Based on studies conducted during the Pool B Demonstration Project, a minimum flow of 250 cubic feet per second (cfs) was needed during the summer to maintain dissolved oxygen levels suitable for fish (Wullschleger et al. 1990a); minimum sustained flows of ≥247 cfs were needed to preserve habitat quality (Wullschleger et al. 1990b). These flows also are needed to maintain the river channel substrate and create an appropriate distribution of vegetation within the river channel.

Water velocity appears to be a factor in the protection of fish and wildlife. Based on observations during the Pool B Demonstration Project, mean channel velocities that exceeded 1.6 feet per second (ft/s) (50 centimeters per second [cm/s]) caused fish to seek refuge or possibly migrate (Wullschleger et al. 1990b, Miller 1990). This value agrees with reports from other systems for two species that occur in the Kissimmee River. For the redbreast sunfish (*Lepomis auritus*), water velocities up to 1.1 ft/s (35 cm/s) are suitable for adults and juveniles, velocities up to 0.7 ft/s (20 cm/s) are suitable for fry and embryo stages, and velocities >1.1 ft/s (35 cm/s) reduce abundance (Aho et al. 1986). For the bluegill, adults prefer current velocities <0.3 ft/s (10 cm/s) but will tolerate up to 1.5 ft/s (45 cm/s) (Stuber et al. 1982a). For largemouth bass, optimal velocities are <0.19 ft/s (6 cm/s), and velocities >0.65 ft/s (20 cm/s) are unsuitable (Stuber et al. 1982b).

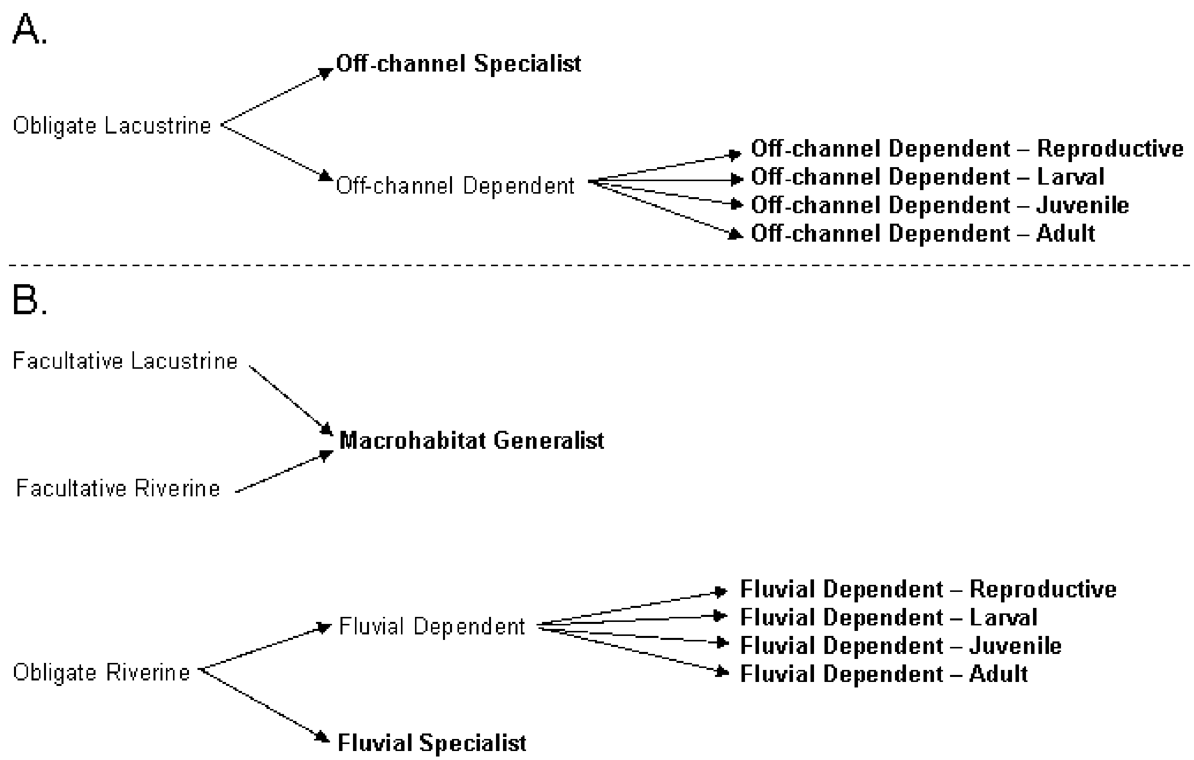


Figure 4-1. Schematic representation of modified macrohabitat guild structure (Derived from: Bain 1992).

(A) New guild categories based on dependence of associated taxa on off-channel habitat. The new Off-channel Dependent category includes species found in a variety of habitats but require access or use of off-channel habitats, or are limited to nonflowing, vegetated waters at some point in their life cycle. These species may have significant riverine populations during particular life history stages. The Off-channel Specialist category refers to species that usually are found only in off-channel habitats or species that are limited to non-flowing, vegetated habitats throughout life. Occasionally, individuals may be found in the river channel, but most information about these fish pertains to off-channel habitat.
(B) Original macrohabitat guild classification developed by Bain (1992).

4.2.2 Kissimmee River Birds

The Kissimmee River and associated floodplain historically served as important breeding and wintering grounds for large populations of wetland-dependent wading birds (Ciconiiformes), waterfowl (Anseriformes), shorebirds (Charadriiformes), marsh birds (Podicipadidae, Ardeidae, Rallidae, and Aramidae), and song birds (Passeriformes) (National Audubon Society 1936-1959, Florida Game and Fresh Water Fish Commission 1957, Weller 1995, Williams and Melvin 2005). Populations of many of these bird groups were negatively impacted by channelization, which substantially reduced the quantity and quality of marsh habitat by the early 1970s (Perrin et al. 1982, Toth 1993, Weller 1995). Pre- and post-channelization data indicated a 92% reduction in the mean number of waterfowl use days for all ducks (Anatinae) and American coots (*Fulica americana*) (Perrin et al. 1982). Prior to channelization, wading bird breeding colonies formed more regularly, were larger, and were not dominated by cattle egrets (*Bubulcus ibis*) (National Audubon Society 1936-1959). Post-channelization changes in hydrology, vegetation communities, and associated prey communities are believed to have contributed to the reduction of wading bird and waterfowl use of the river. This is supported by the latest Kissimmee River Restoration Evaluation Program monitoring data, which indicate the abundance of wading birds and waterfowl has increased over baseline (channelized) conditions since completion of Phase I restoration in 2001 (Cheek et al. 2014, Koebel et. al. 2020). Completion of this phase resulted in periodic flooding of more than 5,792 acres (2,344 hectares) of former pasture and uplands as well as the partial return of historical hydrologic conditions and vegetation communities (Bousquin et al. 2007, 2009). Additionally, this likely produced a concomitant effect on prey populations of invertebrates and small fish (Koebel et al. 2020).

Wetland habitats of the Kissimmee River channel and floodplain now support at least 159 bird species, 66 of which are considered wetland-dependent during some portion of their life cycles (**Appendix F**, Table F-4). This number includes 12 state and 4 federally listed species. A total of 32 wetland-dependent species are breeding residents. The other 34 species depend on the Kissimmee River during some portion of their life cycle, particularly during migration and overwintering, while foraging, roosting, and seeking cover (**Appendix F**, Table F-5). Of the remaining 93 bird species, 68 are considered facultative and 25 opportunistic users of wetlands. Facultative users may nest, forage, and seek shelter in upland habitats, but preferentially use wetlands in most geographic areas or during particular times of the year (e.g., dry season). Opportunistic wetland users are species typically associated with uplands that may periodically take advantage of abundant food or habitat resources near water in certain locations along the Kissimmee River.

During aerial (helicopter) surveys, avian point counts, and other fieldwork, all wetland-associated bird species in **Appendix F**, Tables F-4 and F-5, have been documented using the floodplain in some capacity. The breeding status of each species along the river was derived from direct observations of nesting, presence during the breeding season, and the Florida Fish and Wildlife Conservation Commission (FWC) Breeding Bird Atlas, Distribution Maps by County (FWC 2003). If specific measurements of water depths were not provided in the literature (primarily from Poole [2008]), water depths were taken from direct observations made during point-count surveys or were estimated based on water depths associated with particular vegetation communities along the river. Habitat types were based on field observations made during point-count surveys or from descriptions in the literature that were translated to one of the three primary vegetation types found along the Kissimmee (Broadleaf Marsh, Wet Prairie, and Wet Shrub).

4.2.2.1 Habitat and Hydrologic Requirements of Wetland-Dependent Birds

The general hydrologic characteristics of foraging (mean water depth) and breeding (mean water depth under nest) habitat for wetland-dependent birds of the Kissimmee River are presented in **Appendix F**, Table F-5. Bird habitat along the Kissimmee River can be classified into four principal vegetation community types. The three dominant types of marsh vegetation are the Broadleaf Marsh, Wetland Shrub,

and Wet Prairie groups, described in **Appendix F**. The fourth is Wetland Forest, which is described in Carnal and Bousquin (2005). The plant, macroinvertebrate, fish, amphibian, reptile, bird, and small mammal communities associated with these habitats form the basis of the food web for wading birds, waterfowl, shorebirds, marsh birds, and songbirds. The distribution and structure of these habitats are a function of the timing, magnitude, and duration of the annual hydrologic cycle of flooding (typically June to November) and drying (usually December to May). As such, these functions work in tandem to dictate the location, timing, and success of foraging and reproduction along the river. Wading birds throughout South Florida, for example, are thought to cue the timing of breeding to the increased availability of prey during the dry season, when aquatic invertebrates and small fish become concentrated in isolated pools as water levels recede (Frederick and Collopy 1989a). Without this natural flood/drought cycle, which along the Kissimmee River causes water levels to fluctuate an average of 5.8 ft per year, vegetative community composition, structure, and function change and can negatively impact wetland-dependent bird populations (Toth 1993, Weller 1995). Reduced water levels can affect nest site selection and increase vulnerability to land-based predators (Frederick and Collopy 1989b).

Of the 32 bird species that depend on wetlands for successful reproduction, 9 primarily use herbaceous marsh (i.e., Broadleaf Marsh and Wet Prairie) as their principal nesting habitat, while 23 primarily depend on woody wetland vegetation (i.e., Wetland Shrub and Wetland Forest) to serve as nesting substrate (**Appendix F**, Table F-5). However, four wetland nesting species (bald eagle [*Haliaeetus leucocephalus*], boat-tailed grackle [*Quiscalus major*], mottled duck [*Anas fulvigula*], and osprey [*Pandion haliaetus*]) can nest in upland habitats as long as they are in close proximity to water (e.g., <2 km for bald eagles).

Wading bird nesting colonies along the river typically are found in woody shrubs and trees, either submerged or surrounded by water. This is typical of many wading bird colonies throughout the state that form as follows:

1. On islands (5 to 25 acres [2 to 10 hectares]) surrounded by at least 1.6 ft (0.5 m) of water during the January to July breeding season in Florida (Frederick and Collopy 1989b, White et al. 2005)
2. >164 ft (>50 m) from uplands, or the "mainland" if an island
3. >328 ft (>100 m) from human disturbance
4. Within 0.25 miles (0.4 km) of suitable vegetation with dead and live nesting materials
5. Within 6.2 miles (10 km) of suitable foraging habitat (White et al. 2005)

The Florida sandhill crane (*Grus canadensis pratensis*) typically nests in shallow (5.3 to 12.8 inches [13.5 to 32.6 cm] deep) herbaceous wetlands composed of Broadleaf Marsh and Wet Prairie vegetation types (Stys 1997). Nesting sites may shift to more permanent waterbodies (e.g., lakes) when ephemeral wetlands dry too early in the nesting season or during longer-term drought conditions.

Two waterfowl species that consistently nest along the Kissimmee River are mottled ducks and wood ducks (*Aix sponsa*). Mottled ducks were reported to nest on the ground in hayfields, grazed pasture, and natural upland prairie habitat, averaging a distance of 453 ft (138 m) from water. Wood ducks are tree nesters that prefer mature forests with suitable cavity trees over or near water (<1.2 miles [<2 km]) (Poole 2008).

In addition to nesting habitat requirements, many species require contrasting habitat types to forage and provide food for their young. Of the 32 wetland obligates, 20 species will forage in all 4 vegetation communities in addition to open-water habitat; 5 species specialize in Broadleaf Marsh and/or Wet Prairie; 1 species specializes in Wetland Forest and/or Wetland Shrub; 3 species forage primarily in open water near Wetland Forest and Wetland Shrub; and 3 species forage in a mixture of habitats (**Appendix F**, Table F-5). Preferred habitats of the facultative and opportunistic species can be found in **Appendix F**.

Additional information about stage recession rates is available for wading birds in the Everglades based on long-term monitoring of nesting effort and water levels (Tarboton et al. 2004).

Snail kites (*Rostrhamus sociabilis*) build nests in flooded vegetation of either woody (e.g., willow [*Salix* spp.], buttonbush [*Cephalanthus occidentalis*], cypress [*Taxodium* spp.]) or non-woody (e.g., cattail [*Typha* spp.], bulrush [*Scirpus* spp.]) plant species (Snyder et al. 1989). Nests typically are close, i.e., <164 ft (<500 meters [m]), to appropriate foraging habitat, >164 ft (>50 m) away from the shoreline, and submerged or surrounded by water >1.6 ft (>0.5 m) deep during the January to July nesting season to serve as an effective barrier against land-based predators (e.g., raccoons [*Procyon lotor*]) (Sykes et al. 1995).

Snail kites are almost entirely dependent on both native and exotic apple snails (*Pomacea* spp.) for survival; therefore, snail kite foraging habitat must provide the life history requirements of apple snails, while allowing for successful visual foraging by snail kites. Female apple snails deposit eggs on emergent substrates approximately 3.5 to 9.8 inches (9 to 25 cm) above the water surface during peak egg cluster production in Central Florida (April to May) (Turner 1996, Darby et al. 1999). Darby et al. (2008) found native apple snail recruitment could be reduced during seasonal drydowns by two possible mechanisms: 1) reduced mating and egg-laying due to an early drydown before the peak egg-laying period, or 2) decreased survival of juveniles too small to survive a late season drydown after hatching. However, drydowns occurring every 2 to 3 years are deemed important for maintaining emergent aquatic vegetation critical for egg-laying and aerial respiration (Darby et al. 2008).

Although native apple snails in Florida are naturally adapted to water level fluctuations of 3 to 4 ft (0.9 to 1.2 m) per year, they need to migrate to deeper water during recession events or aestivate in bottom sediments to avoid stranding and desiccation. Darby et al. (2002) found that when water receded to a depth of <4 inches (<10 cm), native apple snails ceased all movements and became stranded in dry marsh. Thus, prolonged low water levels in wetlands can significantly reduce snail kite access to apple snails due to apple snail mortality, matting down of emergent vegetation and subsequent reduction in visibility of apple snails from above, or declines in recruitment during the following season. Complete drying out of the vegetated littoral zone of lakes or wetlands can eliminate snail kite foraging habitat temporarily (e.g., up to 3 months during the dry season) or permanently (e.g., as the result of drainage or other human disturbance). The former is considered part of the natural hydrologic regime in Central Florida. Darby and Percival (2000) indicated 75% of adult apple snails survive this period of exposure to drydown conditions, while 50% survived up to 4 months. Conversely, high water can negatively impact apple snails and their eggs by drowning egg clusters during rapid ascension events and submerging emergent vegetation so that it is unavailable for oviposition. In general, any large changes in water level (e.g., ≥6 inches [≥15 cm] within 2 to 3 weeks) during and after egg-laying can drown egg clusters during high water, cause adults to migrate out of the vegetated zone, or cause egg-laying vegetative substrate to collapse during rapid recession.

The incursion of exotic island apple snails (*Pomacea maculata*) into the LKB has improved foraging conditions for snail kites on the Kissimmee River floodplain, as the exotic apple snail breeds nearly year-round (allowing snail kites to nest well into the wet season) and may be more tolerant of drought. Snail kite activity on the floodplain has greatly increased since arrival of the exotic apple snail, with nearly 100 nests documented on the Kissimmee River floodplain in summer 2018, many of which successfully fledged young. However, as in lakes, nesting remains highly vulnerable to rapid changes in hydrology because rising water levels can inundate nests, while falling water levels can expose them to terrestrial predation. Foraging habitat for snail kites within the Kissimmee Basin includes shallow water (usually ≤4.3 ft [≤1.3 m]) that allows birds to forage effectively for native and exotic apple snails, their principal prey (Sykes et al. 1995). Snail kites fly low (5 to 33 ft [1.5 to 10 m]) over the water or still hunt from perches, while searching for apple snails within the top 6.3 inches (16 cm) of the water column (Sykes et al. 1995).

Wading birds will forage in small (<107 ft^2 [<10 m^2]), and large (>0.25 acres [>1,000 m^2]) habitat patches of all vegetation types, including open water, within wetlands and lake littoral zones. Wading birds usually forage within 3 to 12.5 miles (5 to 20 km) of a breeding colony site. As their collective name implies, wading birds forage by wading in shallow water (2 to 16 inches [5 to 40 cm]) that varies by the morphological characteristics of each species (especially leg length) (**Appendix F**, Table F-5). Although not part of the wading bird order Ciconiiformes, wading depths of the Florida sandhill crane (<12 inches [<30 cm]) also are limited by leg length (Stys 1997).

Fourteen species of ducks use the Kissimmee River, although only four species are resident breeders. Seven species are dabbling ducks that forage at or near the surface, four are diving ducks that forage much deeper under water, and three are tree ducks that perch and/or nest in trees. Dabbling duck foraging habitat along the Kissimmee River generally is shallow (2 to 12 inches [5 to 30 cm]) emergent wetlands with a vegetation:open water ratio between 30:70 and 70:30. Emergent vegetation should be interspersed among open-water areas, forming a mosaic of patches varying in size and shape. Dabbling duck habitat should be available year-round.

Diving duck foraging habitat along the Kissimmee River is typically 1 to 6 ft (30 to 180 cm) deep with at least half the area less than 4 ft (120 cm) in depth. Quality habitat usually has vegetation coverage of at least 40% submerged or floating-leaved vegetation and no more than 40% emergent vegetation. Typically, at least 30% of all vegetation within this habitat is composed of any combination of the following species: *Nymphaea odorata*, *Brasenia schreberi*, *Najas* spp., *Potamogeton* spp., *Vallisneria americana*, and *Hydrilla verticillata*. Submerged aquatic plant species need to reach the water surface for good habitat value. Diving duck habitat is needed from November 15 through March 15, when migrant diving ducks are most commonly found along the Kissimmee River.

4.2.4 KRRP and the Hydrologic Requirements of Fish and Wildlife

The importance of hydrologic characteristics (i.e., discharge, stage, depth, and velocity) as the key components of habitat in river-floodplain ecosystems is well-established in ecological literature (Poff et al. 1997, Arthington 2012). Thus, re-establishment of pre-channelization hydrologic characteristics is a cornerstone of the KRRP. Hydrologic characteristics necessary for the restoration of ecological integrity for fish and wildlife in the Kissimmee River were stated as five hydrologic criteria (**Box 1**) that have been used to guide the design of the restoration project (USACE 1991, Section 8.4.4, Restoration Criteria). These criteria are consistent with the hydrologic requirements for fish and wildlife as described earlier and in **Appendix F**.

The hydrologic criteria emphasize pre-channelization data and the importance of natural patterns of discharge and stage fluctuation in the river and floodplain, especially seasonal and annual variability. The natural pattern of rising and falling discharge with seasonal and annual variability has been termed the natural flow regime and is considered critical for the protection of fish and wildlife (Poff et al. 1997). In floodplain rivers like the Kissimmee River, flows that inundate portions of or all of the floodplain are termed a flood pulse. The resulting connectivity between the river channel and floodplain is a critical component of the habitat requirements of fish and wildlife populations (Junk et al. 1989).

The first hydrologic criterion emphasizes the importance of maintaining flow continuously through time with seasonal and annual variability of the pre-channelization system. This criterion reestablishes the natural flow regime for the Kissimmee River. The other four criteria ensure that as flow passes through the reconstructed river channel it produces desired outcomes for average velocity (second criterion) and floodplain inundation (third, fourth, and fifth criteria).

Box 1. Hydrologic Criteria for the Kissimmee River Restoration Project (From: USACE 1991).

Continuous flow with duration and variability characteristics comparable to the pre-channelization records – The most important features of this criterion are (a) reestablishment of continuous flow from July–October, (b) highest annual discharges in September–November and lowest flows in March–May, and (c) a wide range of stochastic discharge variability. These features should maintain favorable dissolved oxygen regimes during summer and fall months, provide non-disruptive flows for fish species during their spring reproductive period, and restore temporal and spatial aspects of river channel habitat heterogeneity.

Average flow velocities between 0.8 and 1.8 feet per second when flows are contained within channel banks – These velocities complement discharge criteria by protecting river biota from excessive flows, which could interfere with important biological functions (e.g., feeding and reproduction), and provide flows that will lead to maximum habitat availability.

A stage-discharge relationship that results in overbank flow along most of the floodplain when discharges exceed 1,400–2,000 cubic feet per second – This criterion reinforces velocity criteria and will reestablish important physical, chemical, and biological interactions between the river and floodplain.

Stage recession rates on the floodplain that typically do not exceed 1 foot per month – A slow stage recession rate is required to restore the diversity and functional utility of floodplain wetlands, foster sustained river/floodplain interactions, and maintain river water quality. Slow drainage is particularly important during biologically significant time periods, such as wading bird nesting months. Rapid recession rates (e.g., rates that will drain most of the floodplain in less than a week) have led to fish kills (i.e., during the Pool B Demonstration Project), and thus, are not conducive to ecosystem restoration.

Stage hydrographs that result in floodplain inundation frequencies comparable to pre-channelization hydroperiods, including seasonal and long-term variability characteristics – Ecologically, the most important features of stage criteria are water level fluctuations that lead to seasonal wet-dry cycles along the periphery of the floodplain, while the remainder of the (approximately 75%) of the floodplain is exposed to only intermittent drying periods that vary in timing, duration, and spatial extent.

A major component of the KRRP, the HRS is intended to help re-establish the natural flow regime from the Headwaters Revitalization Lakes to the Kissimmee River. The HRS will raise the regulation schedule for the Headwaters Revitalization Lakes so more water can be held in the lakes during periods of abundant rainfall and released at appropriate times to better mimic the natural pre-channelization flow regime than was allowed in the original design of the C&SF Project. The water held in this additional storage is essential for restoration of the natural flow regime.

A conceptual model is used to illustrate a single year of a discharge regime and the benefits to fish and wildlife associated with different portions of an annual flood pulse (**Figure 4-2**). The conceptual model begins with the peak of a flood pulse of sufficient magnitude to inundate the floodplain. Prior to channelization, peak flows could occur almost any time of year, depending on rainfall, but occurred most frequently at the end of the wet season or beginning of the dry season and continued well into the dry season (Anderson 2014a, Koebel et al. 2019). A flood pulse at that time of the year and extending well into dry season can provide floodplain habitat for foraging and reproduction by many fishes (especially the Off-channel Dependent Guild of fish), wading birds, waterfowl, and the endangered snail kite, which has begun nesting in the Kissimmee River floodplain.

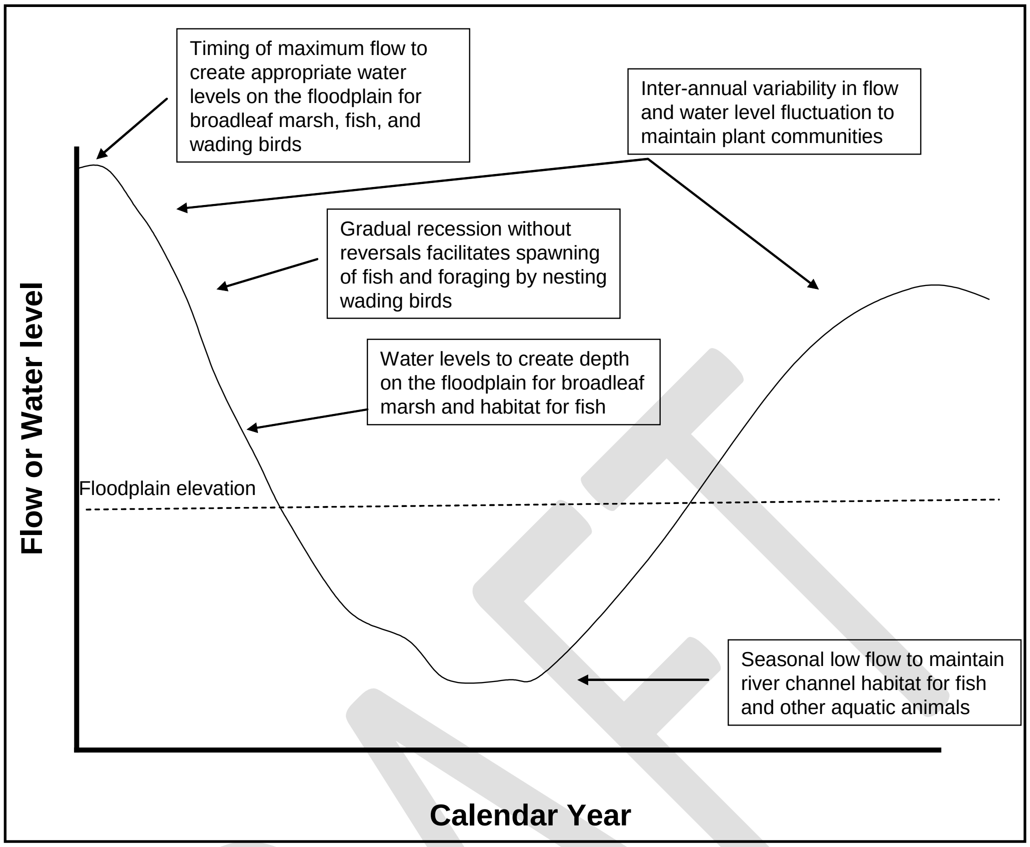


Figure 4-2. Relationship between fish/wildlife and flow or stage.

The peak of the flood pulse in the conceptual model is followed by a gradual recession extending the period of floodplain inundation and providing the appropriate water depth and duration at the frequency needed to maintain wetland plant communities. For example, Broadleaf Marsh, the predominant wetland vegetation group in the pre-channelization floodplain, requires hydroperiods with 1 ft of depth for 210 days in most years (Spencer and Bousquin 2014). Analysis of pre-channelization stage data shows that these conditions were met approximately two-thirds of years prior to channelization (Koebel et al. 2019). Extended periods of floodplain inundation with appropriate depth can protect nest sites and rookeries and also allow for the production of macroinvertebrates and small fish that are important prey species for wading birds and the endangered snail kite. Gradual recession rates also prevent trapping large numbers of fish and invertebrates on the floodplain and create favorable conditions for wading bird foraging. Large increases in flow during the gradual recession can disrupt spawning by fish and nesting by wading birds.

Gradual recession in the conceptual model ends with a transition to seasonal low flows. Such low flows should maintain sufficient depth to prevent crowding of fish and other aquatic animals. It also should have sufficient velocity to maintain habitat for fish and other aquatic animals by aerating the water and preventing accumulation of organic particles on the channel bed, which can benefit dissolved oxygen levels.

While the conceptual model does not explicitly address interannual variation, variability across years is important for long-term maintenance of habitat and persistence of fish and wildlife populations. River flow should vary from one year to the next as a result of rainfall variation and is necessary to maintain habitat characteristics, especially those of wetland plant communities and dependent fish and wildlife. For example, extreme high-water levels establish the upper elevation limit of wetland vegetation by limiting the growth of upland species; extreme low-water levels can create conditions that allow the seeds of some wetland plant species to germinate (Hill et al. 1998, Keddy and Fraser 2000).

4.3 Headwaters Revitalization Lakes and Upper Chain of Lakes Fish and Wildlife Resources

4.3.1 Fish and Wildlife Resources and Habitat

Wildlife considered during development of the Water Reservations include fish, amphibians and reptiles, birds, and mammals. The abundance of fish and wildlife is directly related to major wetland plant communities and their productivity, which form the foundation and structure of the fish and wildlife habitat associated with these waterbodies. The plant communities, in turn, are responsive to specific hydrology and generally are organized along shoreline depth gradients according to flooding tolerance. The KCOL and surrounding area support considerable fish and wildlife resources. The wildlife resources include a nationally recognized largemouth bass fishery, nesting colonies of the threatened wood stork (*Mycteria americana*) and endangered snail kite, and one of the largest concentrations of nesting bald eagles in the United States. Many of the same fish and wildlife species populate all seven of the KCOL reservation waterbodies due to the proximity of the lakes to each other and the canals that connect them.

4.3.1.1 Littoral Vegetation

Littoral vegetation is an important component of fish and wildlife habitat in lake ecosystems (e.g., Williams et al. 1985, Havens et al. 2005, Johnson et al. 2007). In lakes, vegetation is commonly distributed along an elevation gradient that corresponds to increasing light limitation with depth for submersed species and increasing hydroperiod for emergent species (Johnson et al. 2007). This section characterizes the vegetation communities present in each of the KCOL reservation waterbodies and the range of elevations where each occurs. Smaller lakes directly connected to the larger lakes are considered part of the reservation waterbody and are assumed to have similar ecological relationships with hydrology.

Plant communities associated with each of the KCOL reservation waterbodies have been classified from aerial imagery collected by the FWC between 2009 and 2016. There have been other descriptive studies of littoral vegetation in these waterbodies both prior to and after this imagery was collected (e.g. elevation transects, submerged vegetation mapping, drawdown studies of biomass effects, etc.), though the efforts varied largely across waterbodies in scale and timing. The vegetation maps using aerial imagery were created to provide ~~detailed estimates of~~a consistent, system-wide approach for managers to estimate the composition and distribution of flora in ~~most of~~ the reservation waterbodies. For ~~descriptive purposes, the~~the same reasons, we used these maps for littoral vegetation descriptions and found them consistent with results from other studies (e.g. contractor data provided for Myrtle-Joel-Preston). The FWC maps were reclassified into four major community types for descriptive purposes (**Table 4-1**) and overlaid onto approximate shoreline gradients of the reservation waterbodies. This summarizes years of mapping efforts to show how the distribution of littoral communities varies due to hydrologic variations between waterbodies.

Vegetation maps were developed using 2016 imagery for Lake Tohopekaliga and East Lake Tohopekaliga, while 2009 imagery was used for Lakes Hart-Mary Jane, Lakes Myrtle-Preston-Joel, the Alligator Chain of Lakes (represented by Alligator Lake), Lake Gentry, and two of the Headwaters Revitalization Lakes (Cypress and Hatchineha) (Mallison 2009, 2016). To determine elevation distributions for the four major community types (**Table 4-1**), vegetation maps were overlaid onto bathymetric maps developed from surveys in 2011 and 2012 and Osceola County's digital elevation model, which was derived from light detection and ranging (LiDAR) data collected by the United States Geological Survey in 2016. Bathymetric maps were used for lower elevations (a foot or more below maximum flood elevations) while the digital elevation model was used for the shallowest areas. There was no bathymetric map available for Lakes

Kissimmee or Tiger, so only Cypress and Hatchineha were analyzed for Headwaters Revitalization Lakes vegetation patterns.

Table 4-1. Descriptions of the four major vegetation community types analyzed within the proposed reservation waterbodies for elevation distributions. Approximate hydroperiods are included for general reference.

Wetland Class	Description	Hydroperiod (days per year)
Shallow Marsh	Dominated by bunch grasses (*Axonopus furcatus*, *Spartina bakeri*, *Andropogon* spp., *Schizachyrium* spp., *Eragrostis* spp.), spikerushes (*Elocharis* spp.), beak rushes (*Rhynchospora* spp.), yellow-eyed grass (*Xyris ambigua*), smartweed (*Polygonum* spp.), American cupscale grass (*Sacciolepis striata*), and St. John's wort (*Hypericum* spp.)	0 to 365
Broadleaf Marsh	Includes pickerelweed and/or arrowhead (*Pontederia cordata*/*Sagittaria* spp.), and mixes of cattail (*Typha domingensis*)	300 to 365
Deepwater Grasses	Mixes or monocultures of maidencane (*Panicum hemitomon*), Egyptian paspalidium (*Paspalidium geminatum*), and bulrush (*Schoenoplectus californicus*) as well as mixes of cattail	365
Floating Leaf (Pads)	Mixes or monocultures of water lilies (*Nymphaea* spp.), spatterdock (*Nuphar advena*), and/or American lotus (*Nelumbo lutea*)	365

Elevation statistics were calculated for each vegetation polygon based on underlying elevation data. The interquartile ranges of those elevations were plotted by community type for each reservation waterbody, with respect to the elevations of the water regulation schedules (**Figure 4-3**). Historical stage data for each waterbody are described in **Section 4.3.2**. These evaluation methods demonstrate how hydrology varies between waterbodies, both in terms of elevation relative to their respective regulation schedules and their interannual variability.

The elevation distribution of community types varied by reservation waterbody because hydrology varies between the lake systems. However, conceptually, the community types occupied similar positions relative to the regulation schedules within each lake ecosystem. The upland edges of the littoral zones have shallow marshes (short-hydroperiod graminoid and herbaceous species), which also occur with various stands of wetland trees and shrubs (not classified here due to effects of shoreline development). At slightly lower elevations, under semi-permanent or permanent inundation but in relatively shallow water, Broadleaf Marsh vegetation like pickerelweed (*Pontederia cordata*) and arrowhead (*Sagittaria lancifolia*) is predominant. Under permanent inundation and in deeper water (i.e., water up to 6 ft [1.8 m] deep at full pool), floating leaf aquatics like water lilies (*Nymphaea* spp.) and spatterdock (*Nuphar advena*), and deepwater grasses like maidencane (*Panicum hemitomon*) and Egyptian paspalidium (*Paspalidium geminatum*) dominate.

Most of the lakes showed a similar pattern in terms of wetland class elevations, though a few distinctions were notable. Lake Tohopekaliga, for example, has had more extreme drawdowns for fisheries habitat management than any other waterbody in the KCOL, and the deepwater grasses community extended the farthest downslope as a result; more than 6 ft (1.8 m) lower in elevation than the regulation schedule maximum.

The upper elevation of the Broadleaf Marsh community was consistent across waterbodies, except for Lakes Hart-Mary Jane and Lake Gentry. For all other reservation waterbodies, the upper elevation of this wetland class coincided with the lower quartile (25th percentile) of the historical range of lake stages. The Broadleaf Marsh community may occur at deeper elevations in Lakes Hart-Mary Jane and Lake Gentry due to forested wetlands obscuring detection or competing at higher elevations (Lake Gentry), or if stable water levels have

enabled floating mats of Broadleaf Marsh to develop farther downslope. Note that the interquartile range (a measure of water level variation) for Lakes Hart-Mary Jane is the narrowest among the reservation waterbodies, which tends to promote tussock formation.

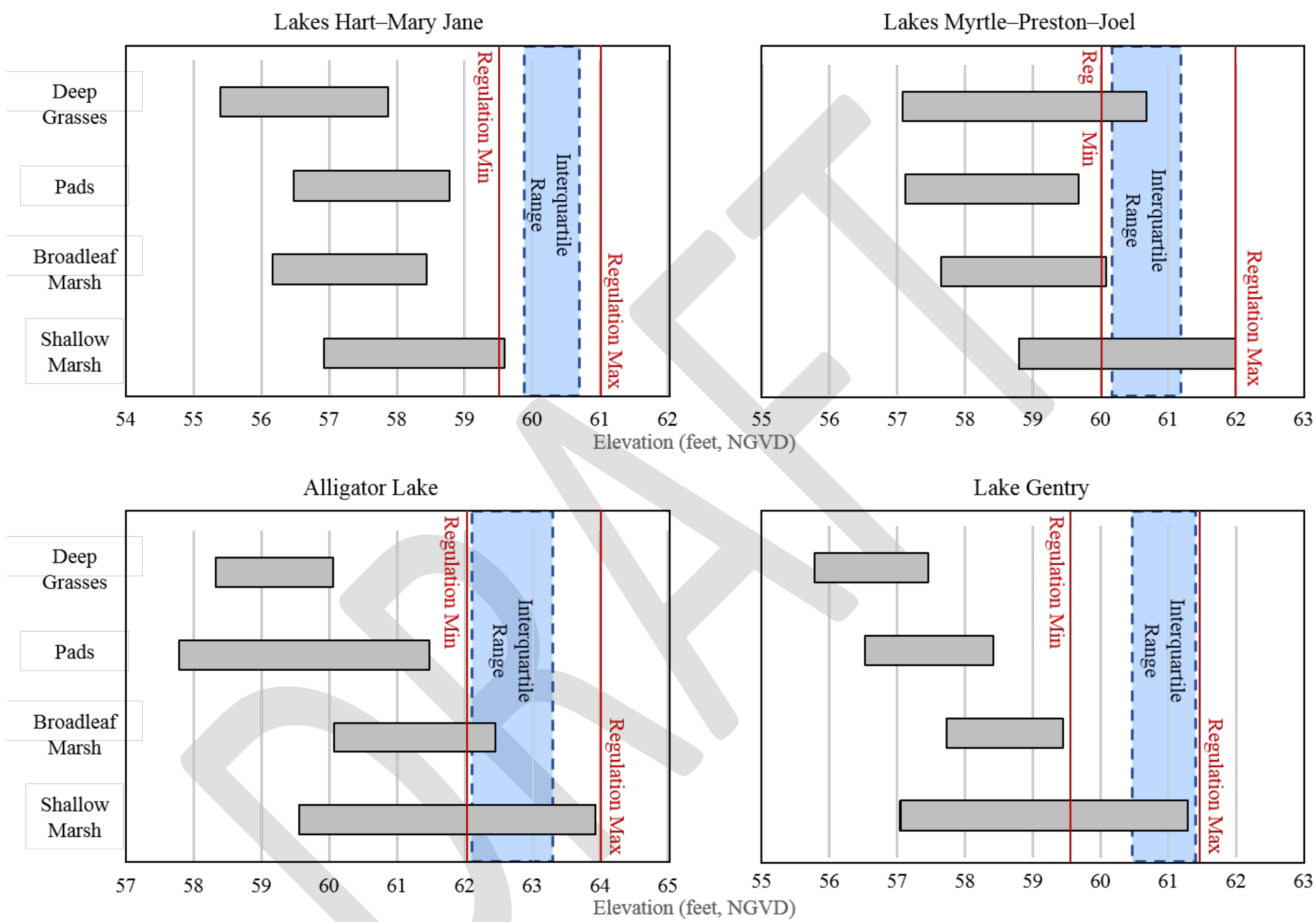


Figure 4-3. Approximate elevations of common vegetation community types for the proposed reservation waterbodies Lakes Hart-Mary Jane, Lakes Myrtle-Preston-Joel, Alligator Lake (representative of the Alligator Chain of Lakes), and Lake Gentry. Shaded gray bars represent the interquartile range of elevations for each community type, while the shaded blue box represents the interquartile range of the historical lake stages from Water Years 1972 to 2019. The minimum and maximum elevations of the regulation schedules are shown in red.

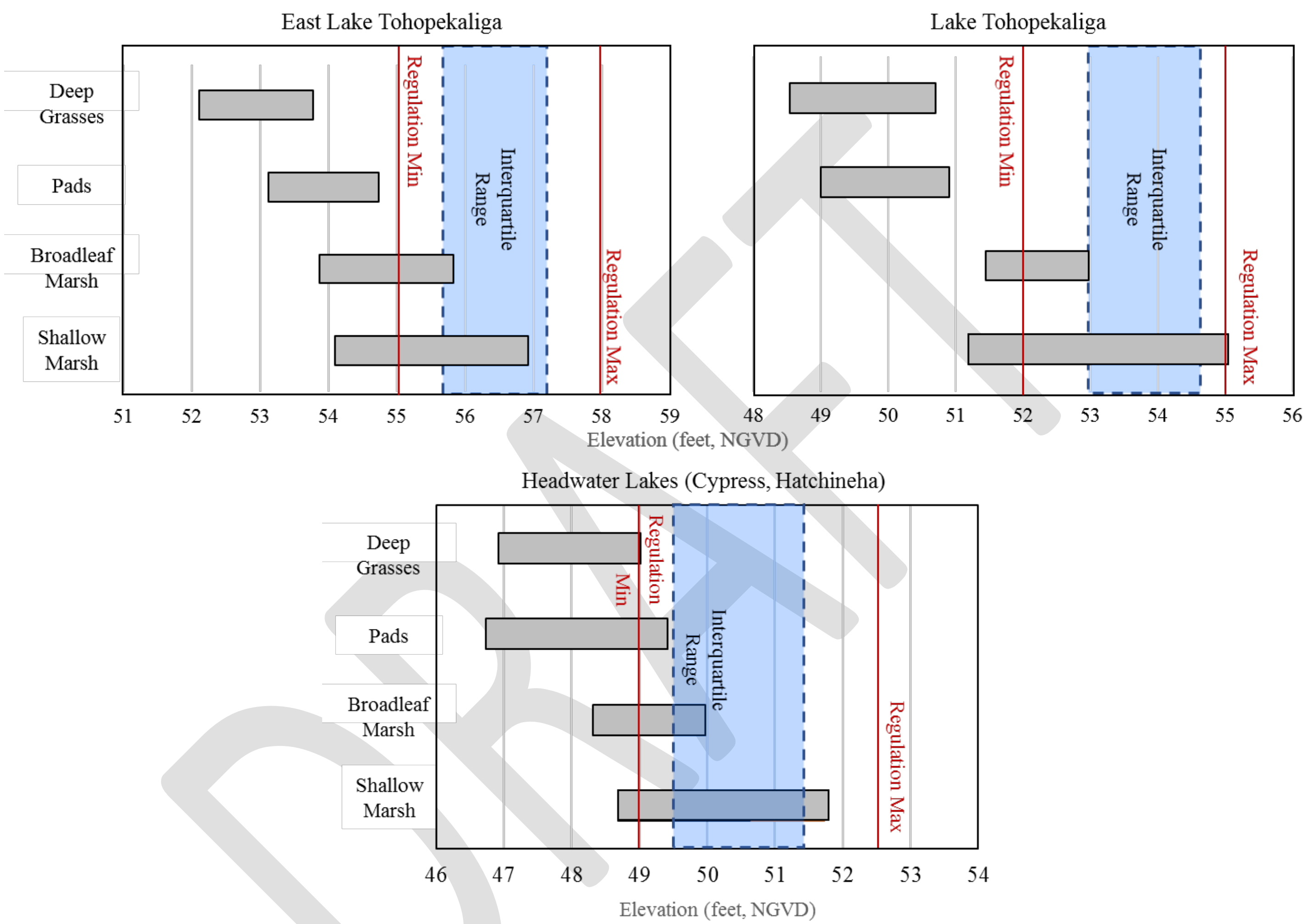


Figure 4-3 (cont.). Approximate elevations of common vegetation community types for the proposed reservation waterbodies East Lake Tohopekaliga, Lake Tohopekaliga, and the Headwaters Revitalization Lakes (Lakes Cypress and Hatchineha only; Lake Kissimmee bathymetry and Tiger Lake imagery/bathymetry were not available). Shaded gray bars represent the interquartile range of elevations for each community type, while the shaded blue box represents the interquartile range of the historical lake stages from Water Years 1972 to 2019. The minimum and maximum elevations of the regulation schedules are shown in red.

4.3.1.2 Fish and Wildlife

Fish are critical components of lake ecosystems, serving as links in the food chain between primary producers and higher consumers. Fish also provide a connection between the aquatic and terrestrial systems, serving as food for wading birds, ospreys, and bald eagles. Based on FWC sampling efforts in the 1980s (Moyer et al. 1987), the KCOL reservation waterbodies are home to at least 45 species of fish (**Table 4-2**). Four popular game fish species—black crappie (*Pomoxis nigromaculatus*), bluegill, largemouth bass, and redear sunfish—were collected in the six reservation waterbodies that were sampled. The littoral wetlands of the lakes are disproportionately important to the fishery, as these areas are the nurseries and prime locations of prey production in the waterbodies.

The KCOL fisheries are important economically as well as ecologically. The lakes are known worldwide for their prized sport fishing and support a robust recreation and tourism industry that is important to the local economy. In 2001, freshwater fishing in Florida generated an estimated economic impact of nearly $2 billion (USFWS 2002). Because of the importance of their fisheries, the Headwaters Revitalization Lakes, Lake Tohopekaliga, and East Lake Tohopekaliga have been designated Fish Management Areas by the FWC, indicating the FWC is managing the freshwater fishery in cooperation with the local county (Osceola County).

Table 4-2. Fish species in six of seven proposed reservation waterbodies (Summarized from: Moyer et al. 1987).

Common Name	Species	Lakes Hart-Mary Jane	Headwaters Revitalization Lakes	East Lake Tohopekaliga	Lake Tohopekaliga	Alligator Chain of Lakes	Lake Gentry
Atlantic needlefish	*Strongylura marina*	X	X	X	X	X	X
Banded topminnow	*Fundulus auroguttatus*		X				
Black crappie	*Pomoxis nigromaculatus*	X	X	X	X	X	X
Blue tilapia	*Oreochromis aureus*		X	X	X		
Bluefin killifish	*Lucania goodei*	X	X	X	X	X	X
Bluegill	*Lepomis macrochirus*	X	X	X	X	X	X
Bluespotted sunfish	*Enneacanthus gloriosus*	X	X	X	X	X	X
Bowfin	*Amia calva*	X	X	X	X	X	X
Brook silverside	*Lebidesthes sicculus*	X	X	X	X	X	X
Brown bullhead	*Ameiurus nebulosus*	X	X	X	X	X	X
Brown hoplo	*Hoplosternum littorale*		X		X		
Chain pickerel	*Esox niger*	X	X	X	X	X	X
Channel catfish	*Ictalurus punctatus*	X	X	X	X	X	X
Coastal shiner	*Notropis petersoni*	X	X		X		
Dollar sunfish	*Lepomis marginatus*	X	X	X	X	X	X
Eastern mosquitofish	*Gambusia holbrooki*	X	X	X	X	X	X
Everglades pygmy sunfish	*Elassoma evergladei*	X	X	X	X	X	X
Flagfish	*Jordanella floridae*	X	X	X	X	X	X

Common Name	Species	Lakes Hart-Mary Jane	Headwaters Revitalization Lakes	East Lake Tohopekaliga	Lake Tohopekaliga	Alligator Chain of Lakes	Lake Gentry
Florida gar	*Lepisosteus platyrhincus*	X	X	X	X	X	X
Gizzard shad	*Dorosoma cepedianum*	X	X	X	X	X	X
Golden shiner	*Notemigonus crysoleucas*	X	X	X	X	X	X
Golden topminnow	*Fundulus chrysotus*	X	X	X	X	X	X
Inland silverside	*Menidia beryllina*		X	X			
Lake chubsucker	*Erimyzon sucetta*	X	X	X	X	X	X
Largemouth bass	*Micropterus salmoides*	X	X	X	X	X	X
Least killifish	*Heterandria formosa*	X	X	X	X	X	X
Longnose gar	*Lepisosteus osseus*	X	X	X	X	X	X
Okefenokee pygmy sunfish	*Elassoma okefenokoee*		X				
Pirate Perch	*Aphredoderus sayanus*	X	X	X	X	X	
Pugnose minnow	*Opsopoeodus emiliae*		X	X	X	X	X
Pygmy killifish	*Leptolucania ommata*	X				X	
Redear sunfish	*Lepomis microlophus*	X	X	X	X	X	X
Redfin pickerel	*Esox americanus americanus*	X		X		X	X
Sailfin catfish	*Pterygoplichthys disjunctus*		X				
Sailfin molly	*Poecilia latipinna*		X	X	X	X	X
Seminole killifish	*Fundulus seminolis*		X	X	X	X	X
Spotted sunfish	*Lepomis punctatus*	X	X	X	X	X	
Starhead topminnow	*Fundulus notti*	X		X		X	X
Swamp darter	*Etheostoma fusiforme*	X	X	X	X	X	X
Tadpole madtom	*Noturus gyrinus*		X		X	X	X
Tailight shiner	*Notropis maculatus*		X	X	X	X	X
Threadfin shad	*Dorosoma petenense*		X	X	X	X	
Warmouth	*Lepomis gulosus*	X	X	X	X	X	X
White catfish	*Ameiurus catus*	X	X		X		X
Yellow bullhead	*Ameiurus natalis*	X	X	X	X	X	X
Total Number of Species		**33**	**42**	**37**	**38**	**37**	**34**

Amphibians and reptiles (herpetofauna) are common but mostly inconspicuous inhabitants of lakes, ponds, streams, wet prairies, marshes and other aquatic habitats of Central Florida. While not extensively monitored in the KCOL reservation waterbodies, amphibians and reptiles likely occur throughout the waterbodies, especially in association with littoral wetland vegetation. A list of amphibian and reptile species likely to occur in the KCOL (**Table 4-3**) was compiled from regional distribution maps (Tennant

1997, Bartlett and Bartlett 1999) and a study of amphibian and reptile use of littoral wetlands on Lake Tohopekaliga (Muench 2004). The listed amphibians include frogs (seven species), one toad species, and six species of salamander. The reptiles include the American alligator (*Alligator mississippiensis*), eight species of turtles, and ten species of snakes. The American alligator is an economically important species and is federally listed as a threatened species (FWC 2013). Recreational harvesting of alligators is allowed with a permit in all the reservation waterbodies with public access, and the larger waterbodies support commercial harvesting of eggs. Lakes Kissimmee, Tohopekaliga, and Hatchineha have the largest alligator populations in the KCOL (Koebel et al. 2016).

Table 4-3. Aquatic amphibians and reptiles likely to occur in the Kissimmee Chain of Lakes. Taxa in bold are known to occur in the littoral zone of Lake Tohopekaliga (From: Muench 2004).

Common Name	Species
Amphibians	
Florida cricket frog	*Acris gryllus dorsalis*
Green tree frog	*Hyla cinerea*
Florida chorus frog	*Pseudacris nigrita verrucosa*
Little grass frog	*Pseudacris ocularis*
Eastern narrow-mouthed toad	*Gastrophryne carolinensis*
Bullfrog	*Rana catesbeina*
Pig frog	***Rana grylio***
Southern leopard frog	***Rana sphenocephala utricularia***
Two-toed amphiuma	***Amphiuma means***
Dwarf salamander	*Eurycea quadridigitata*
Peninsular newt	*Notophthalmus viridescens piaropicola*
Narrow-striped dwarf siren	*Pseudobranchus axanthus axanthus*
Eastern lesser siren	*Siren intermedia intermedia*
Greater siren	***Siren lacertina***
Reptiles	
American alligator	*Alligator mississippiensis*
Florida snapping turtle	***Chelydra serpentine osceola***
Florida chicken turtle	*Deirochelys reticularia chrysea*
Peninsular cooter	***Pseudemys floridana peninsularis***
Florida red-bellied turtle	*Pseudemys nelsoni*
Striped mud turtle	***Kinosternon baurii***
Florida mud turtle	*Kinosternon subrubrum steindachneri*
Common musk turtle	***Sternothernus odoratus***
Florida softshelled turtle	***Trionyx ferox***
Eastern garter snake	*Thamnophis sirtalis sirtalis*
Peninsula ribbon snake	*Thamnophis sauritus sackenii*
Florida water snake	***Nerodia fasciata pictiventris***
Florida green water snake	***Nerodia floridana***
Brown water snake	*Nerodia taxispilota*
Striped crayfish snake	***Regina alleni***
Eastern mud snake	***Farancia abacura abacura***
North Florida swamp snake	***Seminatrix pygaea pygaea***
Florida kingsnake	*Lampropeltis getula floridana*
Florida cottonmouth	*Agkistrodon piscivorus conanti*

Many birds are associated with lakes in Central Florida (e.g., Hoyer and Canfield 1990, 1994) and use these waterbodies for foraging, roosting, and reproduction. Audubon of Florida's list of Important Bird Areas includes three lakes within the KCOL: Lakes Kissimmee, Tohopekaliga, and Mary Jane (Pranty 2002). The Important Bird Area designation indicates that a site supports significant populations or diversity of native birds. An indication of the number of bird species using the KCOL reservation waterbodies can be obtained from Florida's Breeding Bird Atlas (FWC 2003), which was used to compile a list for lakes in Orange, Osceola, and Polk counties (**Table 4-4**). This list contains 43 bird species, and 29 of them were recorded in all 3 counties.

The snail kite is an endangered raptor whose distribution in the United States is restricted to Central and South Florida. Primary critical habitat for snail kites is listed as portions of the Everglades and Lake Okeechobee (USFWS 1999), though the KCOL region has become critically important to the population since 2005 (Cattau et al. 2012). During regional drought years when typical southern, palustrine habitats dry out, lacustrine habitats in the northern portion of the range play a crucial role in sustaining the population. The three primary waterbodies in the KCOL that snail kites use are East Lake Tohopekaliga, Lake Tohopekaliga, and Lake Kissimmee. However, snail kites recently began using portions of the restored Kissimmee River floodplain heavily during the non-breeding season, though some nesting has occurred there as well.

The Florida sandhill crane is listed as a threatened species by the State of Florida (FWC 2013). Its threatened status is based on low numbers due to a low reproductive rate, specialized habitat requirements, and loss of habitat due to humans (Williams 1978). Sandhill cranes occur throughout the KCOL and are included on the species lists in Three Lakes Wildlife Management Area and Lake Kissimmee State Park. While sandhill cranes typically nest in isolated wetlands, there are increasing reports of this species using urbanized and other developed areas (Toland 1999). Sandhill cranes nest in the marsh community on several of the KCOL reservation waterbodies, including Lakes Hart-Mary Jane, East Lake Tohopekaliga, Lake Tohopekaliga, and the Headwaters Revitalization Lakes (Welch 2004). Sandhill cranes likely are using the same habitat in other reservation waterbodies, although the extent of probable use is unknown.

The bald eagle population has been recovering throughout the United States since it was first listed as endangered in 1978. Its status was changed in 1995 to threatened, and it was delisted in 2007. Osceola and Polk counties have the highest number of bald eagle territories (225 total) in the state (FWC 2008). While not all of these territories are near the reservation waterbodies, 2007 nesting data had nests within a 2-km buffer of six reservation waterbodies. Only Lakes Myrtle-Preston-Joel had no nests reported, which could be due to a lack of access and recreational use of those lakes.

Four species of mammals in the region—marsh rice rat (*Oryzomys palustris*), marsh rabbit (*Sylvilagus palustris*), round-tailed muskrat (*Neofiber alleni*), and river otter *(Lutra Canadensis*)—are known to use wetland habitat within the KCOL (Florida Department of Environmental Protection 1998). In addition, several other species of mammals were observed using spoil islands created in the littoral zone of Lake Jackson, a contributing waterbody, including white-tailed deer (*Odocoileus virginianus*), wild pig (*Sus scrofa*), gray fox (*Urocyon cinereoargentus*), raccoon, and bobcat (*Felis rufus*) (Hulon et al. 1998). The extent to which these mammals use the littoral zones of the above lakes likely depends on the quality and quantity of upland habitat along the shores.

Table 4-4. Breeding birds associated with proposed lake reservation waterbodies (Summarized from: FWC 2003).

Common Name	County		
	Orange	Osceola	Polk
American coot	X	X	X
Bald eagle	X	X	X
Belted kingfisher			X
Black rail	X		
Black swan	X		X
Black-bellied whistling-duck			X
Black-crowned night heron	X	X	X
Black-necked stilt	X	X	X
Blue-winged teal	X		
Common moorhen	X	X	X
Double-crested cormorant	X	X	X
Fulvous whistling-duck	X	X	
Glossy ibis			X
Great blue heron	X	X	X
Great egret	X	X	X
Green heron	X	X	X
Gull-billed tern			X
Killdeer	X	X	X
King rail	X	X	X
Least bittern	X	X	X
Least tern	X		X
Limpkin	X	X	X
Little blue heron	X	X	X
Louisiana waterthrush	X		
Mallard	X	X	X
Mottled duck	X	X	X
Muscovy duck	X	X	X
Mute swan			X
Osprey	X	X	X
Pied-billed grebe	X	X	X
Purple gallinule	X	X	X
Red-winged blackbird	X	X	X
Ruddy duck			X
Sandhill crane	X	X	X
Short-tailed hawk	X	X	X
Snail kite		X	X
Snowy egret	X	X	X
Swallow-tailed kite	X	X	X
Tricolored heron	X	X	X
White ibis	X	X	X
Wood duck	X	X	X
Wood stork	X	X	X
Yellow-crowned night heron			X
Total	**35**	**31**	**39**

4.3.2 Hydrologic Characteristics

Major hydrological changes in the KCOL began in the 1880s when extensive canals were dredged to create a navigable route from Fort Myers to the town of Kissimmee, including the Kissimmee River and Chain of Lakes. Lake stages fell significantly and tens of thousands of acres of surrounding wetlands were drained. Between 1962 and 1969, the USACE implemented the C&SF Project for flood control, water supply, and environmental protection. Water control structures were built at the outlet of each waterbody and these lakes currently are operated using water control manuals and regulation schedules. These operations narrowed the range of water level fluctuation in the lakes by not allowing stages to rise as high or to fall as low as they had before regulation (**Figure 4-4**). Elimination of the higher water levels reduced the amount of wetland habitat for fish and wildlife. For example, an estimated 5,600 acres (2,266 hectares) of habitat for waterfowl were lost due to regulation of water levels in Lakes Kissimmee, Cypress, Hatchineha, and Tohopekaliga (Perrin et al. 1982).

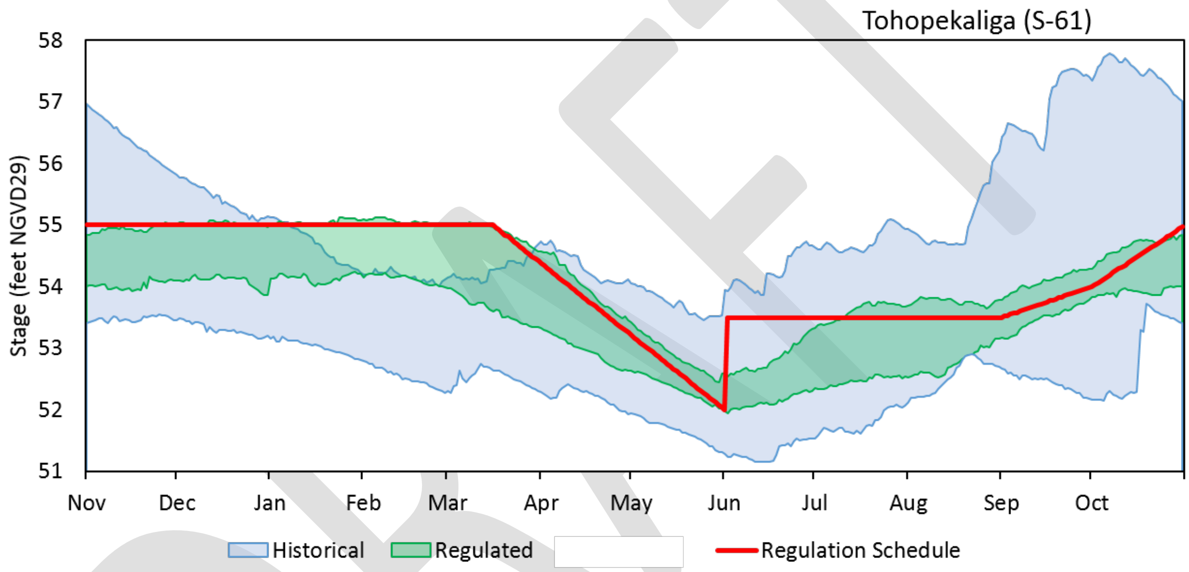


Figure 4-4. The interquartile ranges (25th to 75th percentiles) of daily lake stages before (blue, 1942 to 1962) and with (green, 1964 to 2019) regulation for Lake Tohopekaliga. The current regulation schedule is overlaid in red.

Compared to the major changes associated with adoption of regulation schedules, there have been relatively small adjustments to the schedules since they were first implemented. These changes include permanently shifting the range of water levels down 0.5 ft in Lake Gentry, raising the highest elevation 1 ft and lowering the minimum elevation 0.5 ft in East Lake Tohopekaliga and Lake Tohopekaliga, and raising the minimum elevation 0.5 ft in Lakes Hart and Mary Jane. Most of these schedule changes were made in 1975. In addition to changes in the minimum and maximum elevations in the schedules, minor changes in the shape (seasonality) of the schedule lines also have occurred. The current schedules have been in use since the early 1980s, but the general highs, lows, and seasonality of the schedules have remained relatively unchanged since the 1970s.

While the seasonality and shape of the regulation schedules are very similar among most of the reservation waterbodies (except Lakes Myrtle-Preston-Joel, which recedes from a maximum in December instead of March), the actual historical hydrologic patterns during the regulated period vary considerably among the systems. A review of historical stages from May 1971 through April 2019 (Water Years 1972 through 2019) for each waterbody showed the difference between median daily values and corresponding regulation

schedules varies by season and by system (**Figure 4-5**). For example, median daily stages in East Lake Tohopekaliga and the Alligator Chain of Lakes often were approximately 0.75 ft below the regulation schedules during portions of the dry season (November to May), while Lakes Myrtle-Preston-Joel and Lake Gentry had less than 0.25 ft difference. These hydrologic differences affect the distribution and composition of littoral communities along lakeshore gradients (Keddy 2000, Wilcox and Nichols 2008) and the fish and wildlife associated with each. Drier lakes (relative to their regulation schedules), such as the Alligator Chain of Lakes and East Lake Tohopekaliga, likely have shorter-hydroperiod vegetation communities farther downslope from the maximum flood elevation, whereas Lake Gentry may have relatively long-hydroperiod communities farther upslope.

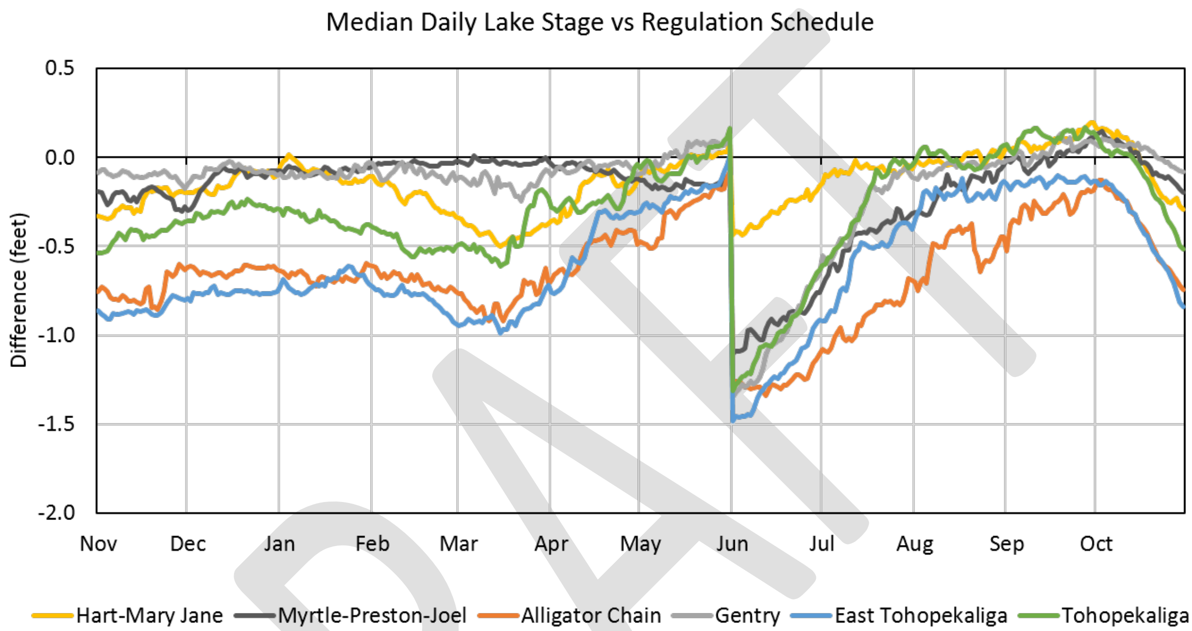


Figure 4-5. The difference between median daily lake stages (May 1972 to April 2019) and each reservation waterbody's current regulation schedule. Negative values indicate median stages are lower than the regulation schedule at that time of year.

The Headwaters Revitalization Lakes were subject to the same effects from water control structures and subsequent regulation schedules but have undergone more recent operational changes. **Section 4.1** discusses regulation of the Headwaters Revitalization Lakes (S-65) under an interim regulation schedule, which was implemented after the first phase of construction for the KRRP was completed in 2001. The HRS will be implemented when KRRP construction is completed.

4.3.3 Linkages Between Hydrology and Biology

Fish and wildlife in the reservation waterbodies have been linked to seasonal and annual patterns of water level fluctuation that support wetland plant communities (USFWS 1958, Williams et al. 1985, Johnson et al. 2007). These vegetation zones are important locations for food production. Parts of plants, such as seeds and tubers, can be consumed directly. Plants also provide attachment sites for algae and invertebrates, which are eaten by various species of fish and wildlife. Additionally, plants provide shelter from predators and serve as nesting sites for many species.

Fluctuating water levels are one of the most important factors that determine the type, abundance, and distribution of vegetation in lake littoral zones (Hill et al. 1998, Keddy 2000, Keddy and Fraser 2000). These fluctuations are important on seasonal, annual, and interannual scales. For example, infrequent, extreme low water levels allow organic components of exposed sediments to decompose more rapidly (Cooke et al. 1993) and allow the seeds of some wetland plants to germinate (Hill et al. 1998, Keddy and Fraser 2000). Extreme low water levels also are an important determinant of the lower limit of emergent vegetation in the KCOL reservation waterbodies (Holcomb and Wegener 1972).

In the KCOL, habitat use by fish and wildlife is linked to seasonal and annual patterns of water level fluctuation. This is due, in part, to how hydrology determines zonation of wetland plant communities, which in turn provide food, shelter, and breeding habitat for various faunal communities. Seasonal elevation of water level also gives fish access to littoral marsh and other vegetated areas where they spawn. During wet years, higher lake stages in the spring increase the percentage of the littoral zone that remains flooded, thereby increasing the availability of foraging and breeding habitat for fish and other aquatic fauna.

Fluctuating water levels are needed to create appropriate inundation patterns (hydroperiods) to maintain the wetland plant communities that provide shelter, serve as spawning locations, and provide refuge for prey. In the KCOL reservation waterbodies, fish use Broadleaf Marsh, Floating Leaf, Deepwater Grasses, and even the Shallow Marsh community when lake stages are sufficiently high. These plant communities are distributed along water depth gradients, and lake stage affects the quantity and quality of available habitats. High water levels during the spawning season, for example, provide fish access to shallower, sandy areas with more vegetative cover for eggs and fry.

Fish are completely dependent on the hydrologic patterns that inundate habitats, provide oxygen, and shape the composition and distribution of vegetation on the lakes. Current regulation schedules for the reservation waterbodies approximate some aspects of natural lake hydrology (e.g., seasonal high at the end of the wet season and a seasonal low at the end of the dry season), albeit with artificial durations. Most regulation schedules permit maximum water levels throughout the winter and early spring. Although such stable, high lake stages would be somewhat unnatural throughout the first portion of the dry season, they do allow fish seasonal access to upper lake elevations for breeding and recruitment, which is important given most of the lakes are reduced in size from their historical condition. Seasonally low water levels are beneficial for predators because littoral shelter becomes limited and forage fish are concentrated. This is especially true for adult largemouth bass that wait at the fringes of littoral vegetation to ambush prey.

Most of the amphibians and reptiles likely to be associated with the KCOL reservation waterbodies prefer vegetated (often dense), shallow littoral zones of lakes and are likely to be associated with the Shallow Marsh, Broadleaf Marsh, and Floating Leaf plant communities of these lakes. A hydrologic regime that offers protection of these three plant communities likely will provide protection for most amphibians and reptiles. Decreasing hydroperiods or eliminating littoral zone habitats by artificially reducing lake stages would adversely impact amphibian and reptile communities of these lakes.

Of the amphibians and reptiles, the feeding and nesting hydrologic requirements are best understood for the American alligator. Alligators are opportunistic and feed on a variety of prey (Newsom et al. 1987). In north-central Florida, alligators feed on fish, reptiles, amphibians, birds, mammals (e.g., round-tailed muskrat), and invertebrates (e.g., crayfish, freshwater snails) (Delany and Abercrombie 1986). Juvenile alligators consume more invertebrate prey than do adults (Delany and Abercrombie 1986, Delany 1990). Nesting in the KCOL is associated with the Broadleaf Marsh vegetation community. Alligators push together soil and vegetation to build dome-shaped nesting mounds, often near permanent water. When constructing nests, alligators show no preference for sites or specific plant species (Goodwin and Marion 1978) but need dense marsh vegetation for nesting material.

Alligators require a hydrologic regime that maintains marsh habitat and provides inundation during the nesting season, and extreme high or low water levels can reduce the availability of nesting sites (Johnson et al. 2007). Nesting generally occurs from mid-June to mid-September, and it is important that water levels are high enough during this period to inundate the marsh community so female alligators can construct nests that will be protected from raccoons and other terrestrial predators (Goodwin and Marion 1978, Newsom et al. 1987, Johnson et al. 2007). It also is important that water levels do not rise so rapidly that nests and eggs are flooded, which might occur after several days of heavy rainfall (Goodwin and Marion 1978).

Extreme water levels can affect alligator survival. Hatchlings use dense marsh habitats to avoid predators and lower water levels may force them into deeper, less protected areas of the marsh (Woodward et al. 1987). Low water levels can also cause heat stress and concentrate alligator populations, making them more vulnerable to cannibalism, disease, and prey limitations (Woodward et al. 1987).

There are specific hydrologic requirements for wading birds and their colonies, and for imperiled avian species in the region. Wading bird colonies depend on water depths in wetland and marsh communities that are shallow enough for foraging, deep enough for protection of nests, and support marsh plant communities long term. Water depths should be at least 1.6 ft (0.5 m) deep around nesting colonies throughout most of the nesting season to reduce terrestrial predator access (Frederick and Collopy 1989b, White et al. 2005). Water levels also must be shallow enough that individuals can hunt for prey and should gradually recede throughout the dry season to concentrate prey.

The hydrologic requirements of snail kites relate to the availability of suitable nesting habitat and their principal prey, apple snails. Snail kites nest in low vegetation over water and are susceptible to failure if water levels recede or ascend too quickly during the breeding season, especially during the peak months from March to June. Additionally, water levels that begin receding too early in the breeding season (prior to January) may reduce the amount of inundated breeding and foraging habitat available during peak nesting periods. Therefore, providing adequate snail kite habitat during the dry season in the KCOL requires balancing high enough water levels to maximize inundated habitat while still allowing for moderate recession rates until June.

Snail kites require sufficient water levels during the nesting season to provide a barrier to terrestrial predators around their nests. A depth of 1 ft (0.3 m) at the beginning of nesting with a slow recession rate is the minimum depth needed to protect nests (Sykes et al. 1995) but will vary depending on distance to shore or density of vegetation between the nest and shore.

The Florida apple snail (*Pomacea paludosa*), which was the primary prey source of snail kites before the proliferation of the exotic apple snail (*Pomacea maculata*), also has specific hydrologic requirements. This species has a life span of a little more than 1 year. Populations of apple snails depend on strong recruitment from eggs laid above water on emergent vegetation or other appropriate substrates. While eggs can be laid from February to November, the peak egg-laying period is April to May, when water levels are declining (Darby et al. 2008). Rapidly declining water levels can leave newly hatched apple snails exposed to desiccation. Apple snails occur in association with emergent vegetation found in the Shallow Marsh, Broadleaf Marsh, and Deepwater Grasses plant communities. Apple snails have poor dispersal ability and are susceptible to desiccation when surface water disappears. Therefore, water levels that completely drain these communities can cause mortality of apple snails.

The hydrologic requirements of sandhill cranes relate primarily to nesting requirements. Nests are constructed in emergent marshes. Nest initiation can begin as early as December, but usually does not begin until January and can extend through August (Stys 1997). In south-central Florida, average laying dates are from February 22 to 24 (Walkinshaw 1982); the mean laying date is March 3 (Tacha et al. 1992). The

average water depth at sandhill crane nests was 0.97 ft (29.6 cm) at the beginning of nesting season in Central Florida (Walkinshaw 1982). Most production of sandhill cranes in Osceola County (Three Lakes Wildlife Management Area) occurred in years with average or above average water levels during the nesting and post-nesting season (Bennett 1992).

The hydrologic requirements of bald eagles include nesting and foraging habitat. Throughout Florida, most bald eagle nests are in pine trees (*Pinus palustris* and *Pinus elliottii*) (FWC 2008), but in the KCOL, they are primarily located in oaks (*Quercus* spp.) and cypress (*Taxodium* spp.). The lakes are much more important for foraging habitat than nesting habitat. Bald eagle nests typically are within 1.25 miles (2 km) of waterbodies with suitable foraging habitats (Buehler 2000). In north-central Florida, bald eagles feed predominantly on fish, waterfowl, mammals, and reptiles (McEwan and Hirth 1980). During the nesting season, bald eagles prefer large fish (13.4 to 15 inches [34 to 38 cm]) (Buehler 2000). Fish that forage near the surface or that occur in shallow water near shore often are taken by bald eagles. A hydrologic regime that supports prey populations is critical to meet the needs of bald eagles.

CHAPTER 5: METHODS AND ANALYSES USED TO IDENTIFY RESERVED WATER

5.1 Introduction

This section summarizes the approaches taken to identify the water that should be reserved from allocation to protect fish and wildlife in each of the proposed reservation waterbodies. The standards on which Water Reservation rules are based [Section 373.223(4), F.S.] afford the SFWMD Governing Board considerable discretion and judgment in determining the quantities and timing of waters that may be reserved from use for the protection of fish and wildlife or public health and safety. The identification of water proposed for reservation is first discussed for the Kissimmee River and Headwaters Revitalization Lakes reservation waterbodies, followed by the UCOL waterbodies.

5.2 Rationale for Reserving All Surface Water Kissimmee River and Headwaters Revitalization Lakes

The KRRP was developed to address public concerns about the effects of the C&SF Project on the Kissimmee River, specifically that loss of flow and floodplain inundation in the Kissimmee River and floodplain had resulted in significant loss of wetland and aquatic habitat and reduced populations of many species of fish and wildlife. The SFWMD, USACE, and other state and federal agencies collaborated through a long period of planning that included a demonstration project, experimentation, a physical model, and computer modeling. The recommended KRRP plan was described in the report *Central and Southern Florida Project Final Integrated Feasibility Report and Environmental Impact Statement Environmental Restoration Kissimmee River, Florida* (USACE 1991) and was authorized by the United States Congress in the Water Resource Development Act of 1992. The estimated final cost of the KRRP is approximately $800 million.

The Headwaters Revitalization Schedule (HRS) was developed to provide the flows from S-65 needed to meet the ecological integrity goal of the KRRP to protect fish and wildlife and help re-establish pre-regulation populations. An interagency team (USACE, SFWMD, USFWS, and FWC) conducted analyses that considered 21 alternative schedules, as described in USACE (1996). After extensive analysis and completion of an environmental impact statement pursuant to the National Environmental Protection Act, the USACE adopted the HRS in 1996. The schedule will be implemented when KRRP construction is complete, which currently is projected for December 2020.

The HRS creates storage in the Headwaters Revitalization Lakes reservation waterbodies by allowing water levels to rise higher than the previous schedule. This allows water to accumulate in the reservation waterbodies during wetter seasons/years to be discharged at a rate that meets the KRRP's hydrologic and ecological integrity goals, which protect fish and wildlife as well as their habitats. Thus, the HRS ensures water levels in the Headwaters Revitalization Lakes reservation waterbodies support fish and wildlife while also meeting the downstream goals of the KRRP.

During development of the HRS, 21 alternatives were simulated using the UKISS model (Fan 1986) to estimate each alternative's effects on the hydrology of the Kissimmee River and Headwaters Revitalization Lakes. Ultimately, an alternative that fully met KRRP and Headwaters Revitalization Lakes project objectives was not found among the simulations (USACE 1996). However, the best-performing alternative, called RS9D, was endorsed and selected by the team agencies (USACE 1996) as the tentatively selected plan (now simply HRS). Because the 1996 simulations could not fully meet KRRP goals, SFWMD scientists concluded that the 1996 analysis supported the reservation of all water not already allocated from

the Kissimmee River and Headwaters Revitalization Lakes reservation waterbodies (**Appendix A**, Figures A-8 and A-9) to ensure protection of fish, wildlife, and habitat intended to benefit from the KRRP.

This conclusion was supported by modeling done specifically for the Kissimmee River and Chain of Lakes Water Reservations in 2008 (SFWMD 2009). The SFWMD developed the Alternative Formulation and Evaluation Tool – Water Reservation (AFET-W) model to simulate basin hydrology and create a "base condition" time series of stage and flow for locations throughout the Kissimmee Basin. AFET-W uses more current information (e.g., land use, existing legal uses) than the UKISS model, simulates a longer period of record (1965 to 2005), and has an expanded spatial domain that includes the LKB to the S-65E structure. An earlier version of the model (AFET) passed an external peer review that did not find any critical defects in the modeling tools (Loucks et al. 2008); AFET-W resulted from recalibration of AFET for a new set of reference evapotranspiration data. The AFET-W base condition includes all features of the completed KRRP (e.g., backfilling of C-38, removal of the S-65B and S-65C water control structures) using the 1996 HRS (alternative RS9D) for S-65 operations. Modeling results were presented in a previous draft technical document (SFWMD 2009). The analysis compared stage and flow duration curves for the base condition time series (representing water in the system) to a target time series representing the hydrologic needs of fish and wildlife. For this analysis, water was considered available for allocation if the duration curve for the base condition time series exceeded the curve for the target time series. Comparisons showed duration curves for the with-project base were below those for the upper threshold target time series for stage in the Headwaters Revitalization Lakes (SFWMD 2009, Figure 7-29 and Table 7-9), flows to the Kissimmee River at S-65 (SFWMD 2009, Figure 7-30), and stage in the Kissimmee River (SFWMD 2009, Figures 7-31 and 7-32). The results, therefore, indicate that all water not already allocated from the Kissimmee River and the Headwaters Revitalization Lakes reservation waterbodies (**Appendix A**, Figures A-8 and A-9) must be reserved. In other words, no additional water is available for allocation due to the overarching goals of restoration and protection of fish and wildlife in the public interest by the KRRP. The water is needed to ensure sufficient volume and timing of flow for Kissimmee River restoration. The peer-review panel, composed of five experts in the field, unanimously concluded that the approach was technically sound and the inferences and assumptions made regarding the linkages between hydrology and the protection of fish and wildlife were based on sound scientific information (Aday et al. 2009).

5.3 Establishment of Water Reservation Lines in the Upper Chain of Lakes

5.3.1 Approach

This section describes the development of hydrologic targets that protect fish and wildlife and their hydrologic requirements discussed in **Chapter 4**. Fish, amphibians, reptiles, birds, and mammals were considered during the development of the Water Reservations. The abundance of fish and wildlife is directly related to major wetland plant communities, which form the foundation and structure of fish and wildlife habitat associated with these waterbodies. The plant communities, in turn, depend on certain hydrologic requirements, which form the underpinnings of the hydrologic targets.

The UCOL reservation waterbodies are Lakes Hart-Mary Jane, Lakes Myrtle-Preston-Joel, the Alligator Chain of Lakes, Lake Gentry, East Lake Tohopekaliga, and Lake Tohopekaliga. An annual stage hydrograph was created for each of the six UCOL reservation waterbodies, which expresses the hydrologic requirements and annual water level pattern needed to protect existing fish and wildlife and their habitats in each waterbody (**Section 5.3.5**). Each hydrograph contains a water reservation line (WRL) that demarcates the boundary between water needed (at or below the line) and water not needed for the protection of fish and wildlife in the lake (above the line). The reservation hydrographs described here apply only to the UCOL, which are the lakes north of the Headwaters Revitalization Lakes. **Section 5.2** describes

the approach used to determine the water needs of fish and wildlife in the Headwaters Revitalization Lakes and Kissimmee River reservation waterbodies.

Each reservation hydrograph was developed to capture the historical duration of inundation (hydroperiod), which is a critical factor in determining plant community composition (Hill et al. 1998, Keddy 2000, Keddy and Fraser 2000, Wilcox and Nichols 2008), habitat availability, and fish and wildlife assemblages (Williams et al. 1985, Johnson et al. 2007) between the highest and lowest water levels in a littoral zone. Capturing the hydroperiod patterns required for fish and wildlife in the reservation waterbodies was done by: 1) protecting representative seasonal water levels in each waterbody; 2) limiting the total volume available for withdrawal throughout the reservation waterbodies; and 3) limiting withdrawals based on downstream water levels in Lake Okeechobee. Together, these criteria directly protect some portion of annual hydroperiods and indirectly protect year-to-year variation due to downstream constraints (**Section 5.4**).

The approach used to establish the WRLs in the reservation hydrographs for the UCOL reservation waterbodies was based on several assumptions: 1) existing fish and wildlife habitats and resources in the reservation waterbodies reflect recent hydrology; 2) protecting historical seasonal highs, lows, and some portion of transitions between those events will protect current fish and wildlife resources; and 3) these protections are sufficiently captured in the reservation hydrograph, similar to a regulation schedule.

A water level regime can be characterized in many ways, including magnitude (e.g., high and low water levels), timing (seasonality), duration, frequency of flooding, and rate of change (recession and ascension rates). All these characteristics can be represented on an annual hydrograph, except for how they vary between years or over a multi-year period (interannual variation). Most of the fish and wildlife requirements identified for the UCOL reservation waterbodies are expressed in terms of stage, seasonality, duration, and recession/ascension rate that can be represented on an annual stage hydrograph. The long-term maintenance of habitat for fish and wildlife in the lakes also depends on annual variability based on rainfall patterns. The WRLs developed for the UCOL reservation waterbodies protect these requirements by defining an upper boundary that preserves much of the interannual variation in water levels in these lakes.

The total amount of wetland habitat available within a reservation waterbody is related to the water level regime. Lowering water levels can reduce the amount and change the type of wetland habitat available to fish and wildlife, in three primary ways: 1) decreasing the amount of inundated area available at a given time; 2) shortening the hydroperiod in shallow areas and increasing light penetration in deeper areas, both of which can alter plant communities; and 3) decreasing the accessibility of habitat to fish and wildlife by reducing the amount of time that water levels provide adequate depth.

The current stage regulation schedules constrain the maximum water level in the UCOL reservation waterbodies for the protection of public health and safety (i.e., flood protection). Water levels in the reservation waterbodies will rise to the regulation schedule when there is sufficient rainfall. These seasonal high-water events define the upper limit of wetland vegetation in the lakes (the landward extent) and maximize the quantity and distribution of habitat available for use by fish and wildlife. Higher water levels occurred prior to regulation, which would have allowed wetland plant communities and their associated fish and wildlife to occupy higher elevations than they currently do (**Section 4.3.2**). The reservation hydrographs and WRLs capture the current maximum water level on November 1 for all lakes and capture varying extents of inundation throughout the year based on historical stage data in different waterbodies.

Almost 40 years have passed since completion of the water control structures in the UCOL and more than 30 years since the current regulation schedules were adopted and implemented by the USACE for the UCOL reservation waterbodies. The existing fish and wildlife resources and littoral habitats in these lakes reflect the varied, long-term hydrological patterns of the different reservation waterbodies. Therefore, developing

WRLs that account for the heterogeneity among systems also protects the flora and fauna adapted to those unique hydrological patterns. The process to develop the WRLs involved 1) specifying a seasonal high stage and duration; 2) specifying a seasonal low stage; 3) connecting the seasonal high stage to the seasonal low stage with a straight-line recession event; and 4) adjusting the resulting WRL to protect historical breeding season and wet season hydrological patterns (recession and ascension rates or breeding season water levels).

5.3.2 Seasonal High Stage

The WRL seasonal high stage defines an upper stage limit or threshold that preserves the maximum littoral extent (landward extent) in each waterbody, ensuring no reduction in wetland extent will occur below that elevation. For all UCOL reservation waterbodies, the seasonal high stage was specified as the high stage limit of the current stage regulation schedule and to occur beginning on the first day the schedule allows that stage to be reached (November 1). The region's rainy season generally ends in October, so the regulation schedules allow higher lake stages coincident with the onset of the dry season (reduced chance of flooding). Therefore, establishing the seasonal high stage early in the dry season preserves higher lake levels as close to the wet season as possible under the current regulation schedules. Establishing the WRL seasonal high stages at the same stage and timing as the authorized regulation schedule also captures the water levels required to maintain the current shoreward extent of littoral/wetland vegetation in these waterbodies. While water levels do still occasionally exceed the regulated maximums in these waterbodies, those high lake stages trigger flood control releases and will not be protected for fish and wildlife.

The duration of time protected at the seasonal high stage for each reservation waterbody was determined by reviewing annual lake stages between November 1 and March 15 from 1971 to 2019. These months coincide with the maximum stages allowed under the current regulation schedules for most waterbodies. For each UCOL reservation waterbody, the average date when lake stages reached the maximum regulation schedule during this period was calculated, as was the proportion of time that stages met or exceeded the schedule during this period. In other words, the average date lake stages reached the maximum of the regulation schedule (if they did) and how many days lakes were at maximum stage on average were determined. These two periods were combined to determine the amount of protection for each waterbody at "high pool," or at the maximum stage allowed under the current regulation schedule. For example, if the average date a particular waterbody reached the maximum regulatory stage was December 8, and the average number of days spent at or above the regulatory schedule each year was 23 days, then the seasonal high stage of the WRL would extend from November 1 to December 31 (December 8 + 23 days = December 31). This method provides protection at current maximum stages for the average duration and timing of historical events for each waterbody, based on individual lake stages.

5.3.3 Seasonal Low Stage

Selection of the seasonal low stage established how much of the littoral zone can be dried out on an annual basis (i.e., it defines the boundary between truly aquatic vegetation and those that require regular drying events). Under the current regulation schedules, lake stages are managed to reach the same low stage on May 31 every year, providing storage capacity for flood control at the beginning of the wet season. In order to protect the extent of permanently flooded marshes, the WRL minimums were set as the minimum of the regulation schedules. This ensures that the extent of annual drying events would not be increased downslope from historical levels, which might lead to a reduction in overall open-water extent, or an expansion of the littoral zone lakeward (downslope).

5.3.4 Transition Between Seasonal High and Low Stages

After selecting seasonal high and low stages for the UCOL reservation waterbodies, recession rates were established based on a review of historical dry-season stage data for each waterbody. Most regulation schedules for these lakes allow up to maximum water levels until March 15 (except on Lakes Myrtle-Preston-Joel, which begin receding after December 1), before declining to a seasonal low on May 31. However, actual historical stages between November 1 and March 15 vary substantially between waterbodies because of differences in lake operations, how the current regulation schedule was established, watershed size, and groundwater interactions, among other factors. For example, historical stages on March 15 typically are well below the maximum of the regulation schedule even without releases on some waterbodies (e.g., the Alligator Chain of Lakes), whereas others very often are near the maximum (e.g., Lake Gentry) (**Figure 4-5**). Therefore, historical dry-season and breeding-season hydrology varies between the waterbodies, especially relative to their respective regulation schedules. In order to protect these varying historical patterns, scientists selected the average daily stage on March 15 and drew recession lines between the seasonal high and seasonal low targets. This ~~wasn't~~was not necessary on lakes Myrtle-Preston-Joel since the average stage on March 15 was essentially the same as the regulation schedule, due to its ~~shape.~~earlier drawdown period (**Figure 5-1**). The resulting WRLs have a two-stage recession for most waterbodies, with a shallower slope prior to March 15 and a steeper slope afterward, which mimics natural dry-season patterns driven by rainfall and evapotranspiration. However, due to historical stage variation between waterbodies, the WRLs differ relative to their regulation schedules and their shapes differ between waterbodies. Essentially, lakes with lower historical stages have lower WRLs relative to their regulation schedule (and vice versa), but the level of protection is similar throughout, based on individual historical stages.

The differences between WRLs among the reservation waterbodies represent historical inundation patterns and water management of each waterbody, and the protection of dry-season stages is similar regardless of how the WRL compares to its regulation schedule. In all cases, the maximum stages are protected at the regulatory schedule maximum, based on average durations of historical high-water events, and protection declines gradually throughout the breeding season to roughly the average daily stage by March 15. This varying protection provides a higher probability of achieving maximum lake stages in the beginning of the dry season, with gradually lower probabilities of high stages until mid-March, and tailors each WRL to the historical hydrology persistent in each system. Additionally, the difference in lake volume between the WRL and regulation schedules declines after March 15 because historical stages are closely driven by flood control releases during the recession phase of the regulation schedule.

Two waterbodies had an additional change to the WRL to accommodate breeding season recession rates of the endangered snail kite. Lake Tohopekaliga and East Lake Tohopekaliga support a large breeding population of snail kites from year to year, having supported up to 80% of statewide snail kite nesting activity in a given year (Cattau et al. 2008). Like many fish and wildlife species, snail kites are vulnerable to rapidly receding water levels during the breeding season (Fletcher et al. 2017). Unfortunately, that is how the flood control line in some of the regulation schedules is designed (e.g., a decline in stage of 1.2 ft per month from mid-March to June on Lake Tohopekaliga and East Lake Tohopekaliga). In order to accommodate slower water level recession rates but still provide as much inundated littoral habitat as possible for nesting, water managers typically release water from these lakes (if stages are high) between January and May, inducing a longer, slower reduction in lake stages than the flood control portion of the regulation schedule would require. Essentially, these operations more closely mimic naturally receding water levels through the dry season, rather than holding high lake stages into March and then rapidly releasing them to make room for flood control storage before June. However, because this is a relatively recent practice (approximately 10 years of operations), the average historical stage on March 15 in the 1972 to 2019 period of record is higher on Lake Tohopekaliga and East Lake Tohopekaliga than typically is experienced after implementation of managed recession rates. Therefore, the WRLs were adjusted to more

closely match recession rates recently targeted by water managers and to protect breeding season habitat for endangered snail kites. The WRLs were adjusted to accommodate a straight-line recession from high to low pool beginning January 1. On East Lake Tohopekaliga, this reduced the WRL duration at the top of the regulation schedule by 1 day, and the WRL elevation on March 15 by 0.24 ft (7.3 cm) from what it would be using the same method as other lakes. On Lake Tohopekaliga, this reduced the WRL duration at the top of the regulation schedule by 21 days, and the WRL elevation on March 15 by 0.43 ft (13.1 cm). This change was not necessary for other UCOL reservation waterbodies due to lower average March 15 stages or to a lack of snail kite activity on those lakes.

Ascension rates from the seasonal low of the WRL were established in much the same fashion; the seasonal low stage was connected to the summer high stage with a straight line that would accommodate ascension rates of up to 1 ft (30.5 cm) per month. These ascension rates are slow enough that vegetation can keep up with rising water levels and reproduction requirements of fish and wildlife like apple snails and alligators are protected, but fast enough to capture early season rainfall and allow lake stages to recover from seasonal lows. The resulting WRLs protected the average daily lake stages or greater between June and August.

The largest difference between the WRLs and regulation schedules for most waterbodies occurs on June 1, which is when regulation schedules shift from prioritizing flood control to building water supply during the rainy season. This change in regulation schedule (from seasonal low to summer pool) varies from 0.5 ft on Lakes Hart-Mary Jane to 1.5 ft on Lake Gentry, East Lake Tohopekaliga, and Lake Tohopekaliga. While regulation schedules allow up to 1.5 ft higher stages on June 1 than on May 31, actual increases in water levels are a function of rainfall and watershed size and are reflected in the historical daily stage data. By reserving at least the average of daily stages from June to August, individual waterbodies' refill capacities are protected and reductions in wet season hydroperiod are limited to the 1- to 2-month period that the WRL is below the regulation schedule after June 1. In short, approximately the same percentile of historical stages is protected under the WRL on May 31 and June 1, but the difference between the WRL and regulation schedule on those days is substantial.

The approaches used to establish the WRLs described above do not represent a linear continuum of a certain percentile of historical stages between the seasonal high and seasonal low. The actual percentile values for each day of the WRL may fall between the 99th percentile (November 1 for the Alligator Chain of Lakes) and 22nd percentile (March 15 on Lake Tohopekaliga), depending on the waterbody and date. Furthermore, the actual future pattern of water level fluctuation in a reservation waterbody will depend on rainfall patterns, contributing surface water inflows, water management, and any permitted consumptive use. The threshold approach used to develop the reservation hydrographs does not explicitly address annual or interannual variation in water levels, but rather preserves the variability that occurs below the WRL). Combined with other rule constraints (**Section 5.4**), some portion of the interannual variability above the WRL is reserved as well, albeit at a less predictable rate than the portion under the WRL.

Changes in hydrologic conditions that may occur using the aforementioned approach to establish the WRL likely would manifest in the durations of inundation (hydroperiod) of the littoral marshes that lie between the seasonal high and low stages, and potentially the depth at which light penetration supports aquatic plant growth (especially submerged species at low elevations). These potential impacts were minimized by protecting at least the mean of daily stages through most of the dry season and by protecting the same highs and lows that are authorized under the current regulation schedules. Furthermore, by establishing the WRLs based on historical stages, the same general pattern of dry season recessions is preserved; long, slow, gradual recessions during historically drier systems (e.g., Alligator Chain of Lakes) and fast, managed recessions following high, stable stages in historically wetter systems (e.g., Lake Gentry).

5.3.5 Specific Water Reservation Lines for Lakes

Following the method described earlier, reservation hydrographs were developed for the six UCOL reservation waterbodies (**Figure 5-1**). For reference, the hydrographs also show the current stage regulation schedules that have been used for approximately the last 30 years as well as the interquartile range of average daily stages from May 1, 1971 to April 30, 2019 (Water Years 1972 to 2019) for each reservation waterbody.

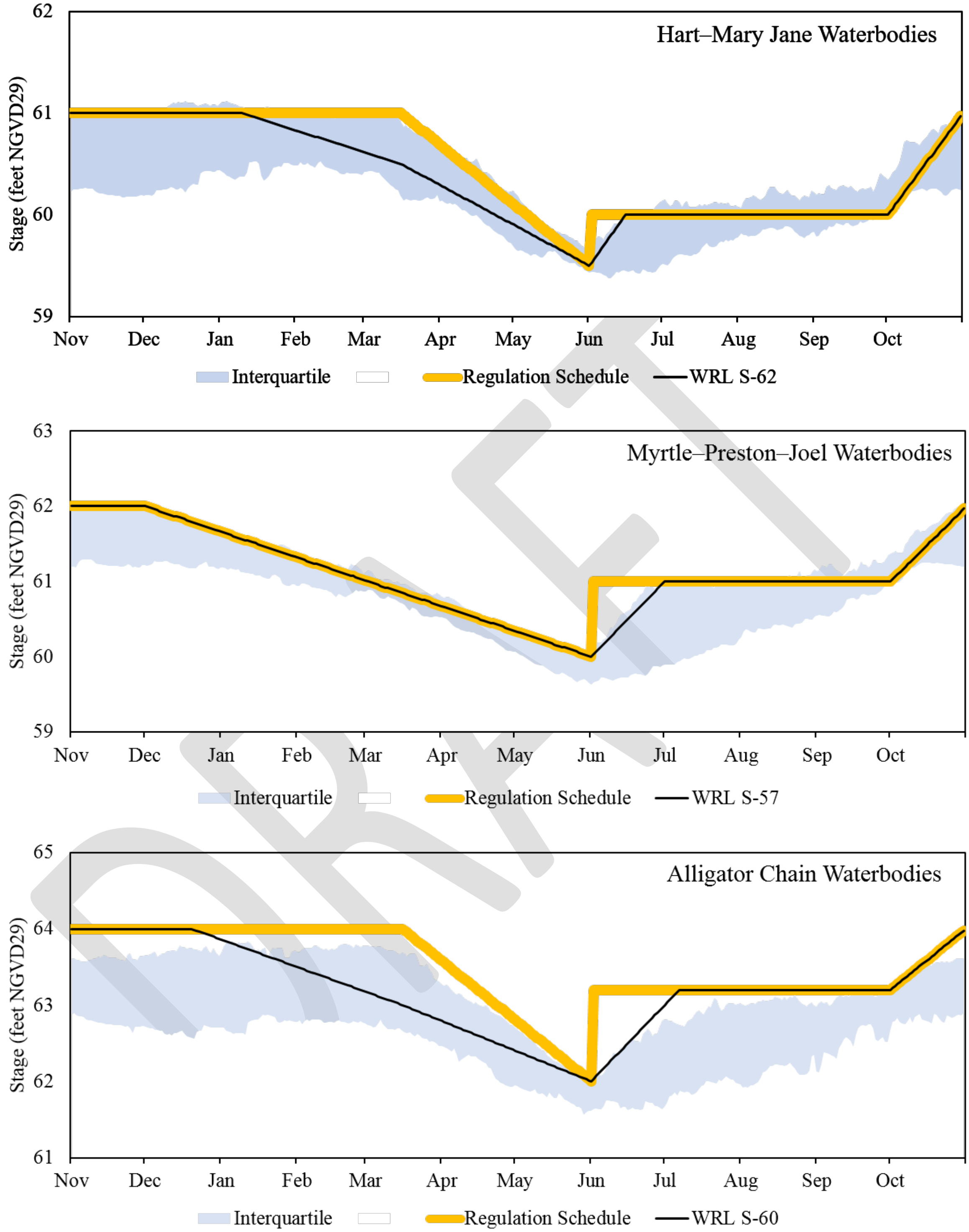


Figure 5-1. Water reservation hydrographs for the Lakes Hart-Mary Jane, Lakes Myrtle-Preston-Joel, and the Alligator Chain of Lakes reservation waterbodies. The water reservation line (WRL) is shown in black, and the federal regulation schedule is shown in yellow. The light blue shaded area represents the interquartile range (25^{th} to 75^{th} percentiles) of historical daily lake stages from May 1971 to April 2019.

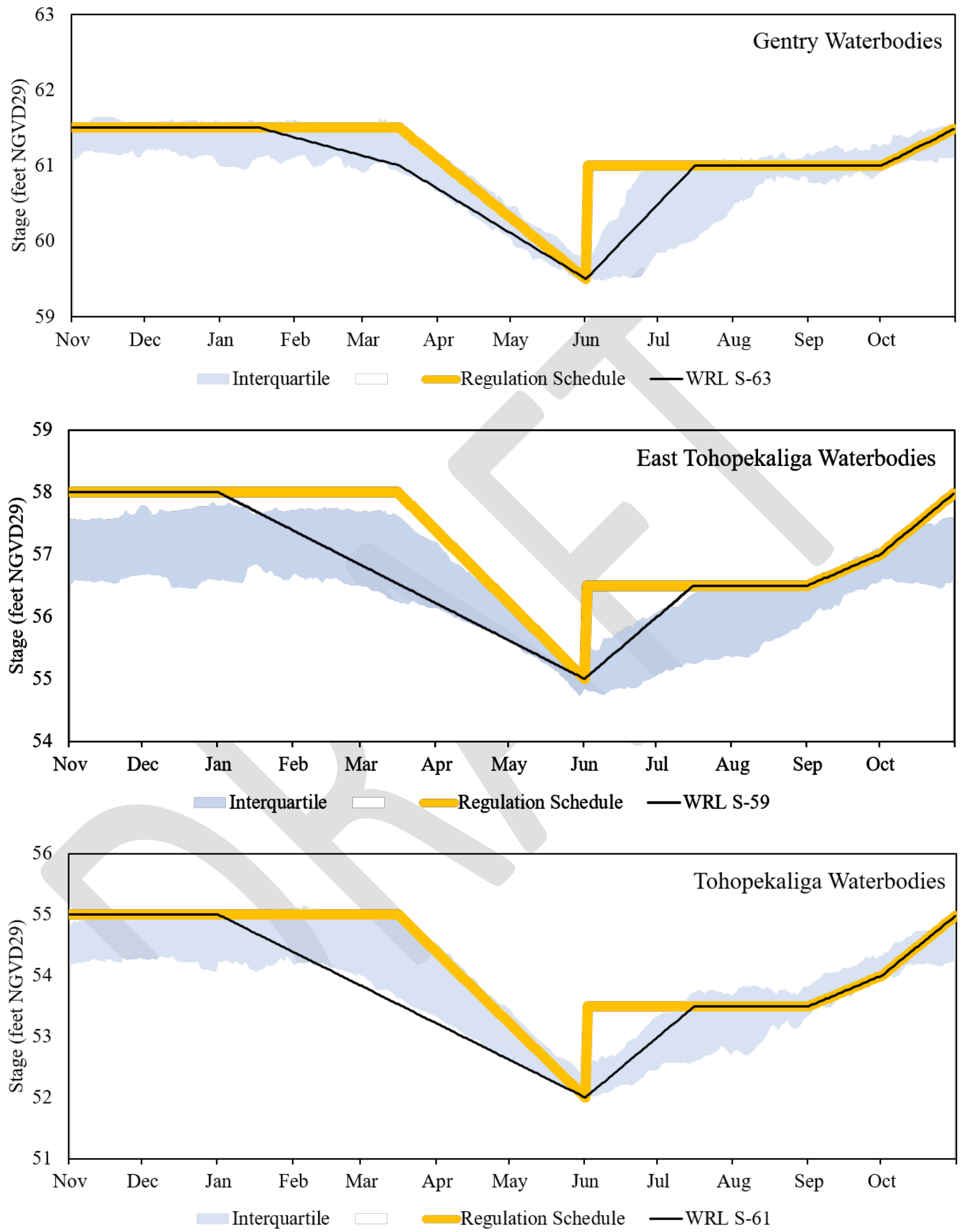


Figure 5-1 (cont.). Water reservation hydrographs for the Lake Gentry, East Lake Tohopekaliga, and Lake Tohopekaliga reservation waterbodies. The water reservation line (WRL) is shown in black, and the federal regulation schedule is shown in yellow. The light blue shaded area represents the interquartile range (25th to 75th percentiles) of historical daily lake stages from May 1971 to April 2019.

5.4 Impact Evaluation and Water to be Allocated

5.4.1 Existing Uses of Water from Proposed Reservation Waterbodies

Section 373.223(4), F.S., states that when establishing a Water Reservation, all presently existing legal uses of water shall be protected so long as such use is not contrary to the public interest. Existing water use permits were reviewed to determine the location and volumes under current allocations from the proposed reservation waterbodies. Historical uses also were identified. Permit selection included direct withdrawals of surface water from a reservation or contributing waterbody and withdrawals of groundwater from the SAS that could cause drawdown in a reservation waterbody. A search radius of 1 mile (1.6 km) around each proposed reservation waterbody was used to locate permitted groundwater withdrawals from the SAS.

Ninety-~~eight~~seven existing permits (**Table 5-1**) were identified that have at least one well completed in the SAS within 1 mile (1.6 km) of a reservation waterbody. In total, 5.~~7~~876 million gallons per day (mgd) are allocated from the SAS within these ~~98~~97 permits. Agricultural and livestock uses compose the majority of this volume. ~~Thirteen~~Fourteen existing permits (**Table 5-2**) were identified that withdraw surface water from reservation or contributing waterbodies, with a combined allocation of 42.~~45~~74 mgd. Ten of these permits are for agriculture. The largest allocation (13.75 mgd) is attributed to Adams Ranch for withdrawals from Lake Marian. The Lake Toho Restoration/Alternative Water Supply Permit (49-02549-W) allows for diversion of water from East City Ditch and Mill Slough into an aboveground impoundment for the supplementation of Toho Water Authority's reclaimed water supply. Withdrawals for this permit are constrained by specific daily water levels in Lake Tohopekaliga, consistent with the 2017 draft Water Reservation rules that existed at the time of permit issuance. The SFWMD analyzed the withdrawals from existing legal users and determined that the existing legal users are not contrary to the public interest.

As discussed in **Section 5.3**, fish and wildlife within the proposed reservation waterbodies have adapted to the existing hydrologic conditions and approved regulation schedules that have been in place since the 1980s. This includes the effects of documented and any potentially undocumented historical uses that have occurred. Existing legal users were granted water use allocations for withdrawal after all water use permitting criteria were met at the time of permit issuance or renewal. All historical uses are reflected in the observed stage and flow data that were part of the evaluation to determine the water to be reserved for protection of fish and wildlife in the Kissimmee River and KCOL. The data and modeling associated with this evaluation show that the water within the Kissimmee Basin system is driven primarily by climate (rainfall and evapotranspiration) and operations rather than historical uses. During wet years, floodplain inundation most likely will correspond with regulatory flood control releases from Lake Okeechobee to either the Caloosahatchee River or St. Lucie Estuary when there is less demand for water.

During the state and federal planning and feasibility studies process, it was determined that "there would not be a significant effect on Lake Okeechobee water supply with the restoration of the Kissimmee River" (USACE 1991). Resultant effects (reductions) also are not expected in Everglades National Park.

Table 5-1. Surficial aquifer system wells near the reservation waterbodies.

Permit Number	Project Name	Land Use	Average Daily Allocation (mgd)
28-00096-W	B and E Ranch and Grove	Livestock	0.0052
28-~~00016~~00116-W	Smith Okeechobee Farms	Agriculture	2.342
28-00290-W	Buckhorn Housing	Public Water Supply	0.0106
28-00379-W	Hidden Acres Estates	Public Water Supply	0.0192
28-00444-W	Trails End Fishing Resort	Public Water Supply	0.0103
28-00495-W	Butler Oaks Farm CNMP Implementation	Livestock	0.1945
28-00532-W	Depot Pasture Well	Livestock	0.0075
28-00538-W	B4 Inc., Dairy	Livestock	0.09
28-00551-W	Family Tree Lockett	Livestock	0.0027
28-00552-W	Ronald D Butler's Ranch	Livestock	0.0010
28-00646-W	Hickory Hammock – Equestrian Center	Livestock/Public Water Supply	0.0013
28-00650-W	Hickory Hammock – Istokpoga Boat Ramp	Public Water Supply	0.0012
28-00712-W	Pacos Ranch	Livestock	0.0026
28-00752-W	FRH Surficial Use	Livestock	0.0036
28-00769-W	Double Rock Ranch	Livestock	0.0445
47-00010-W	Lofton Ranch	Livestock	0.0006
47-00025-W	Clemons Okeechobee	Livestock	0.0171
47-00029-W	D Cross Ranch	Livestock	0.0072
47-00030-W	Bar Crescent S Ranch	Livestock	0.0262
47-00032-W	One Nine Cattle Company	Livestock	0.0084
47-00034-W	El Yolo 8	Agriculture	0.6302
47-00043-W	Eagle Island Farm	Agricultural	0.238
47-00381-W	Okeechobee Field Station	Landscape	0.0018
47-00498-W	Todd Clemons Grove	Agriculture	0.1897
47-00531-W	J A Tootle Property	Agricultural	0.0309
47-00706-W	Coquina Water Management (Office Well)	Public Water Supply	0.0005
47-00737-W	United States Army Corps of Engineering	Public Water Supply	0.0005
~~47-00880-W~~	~~Frances G Syfrett Ranch~~	~~Livestock~~	~~0.0062~~
47-00815-W	Raulerson and Sons Ranch	Agricultural/Livestock	0.8027
47-00836-W	Emory Walker Ranch	Livestock	0.0012
47-00837-W	Wallaces Brahmans	Agricultural/Livestock	0.0005
47-00856-W	Cabbage	Industrial	0.0068
47-00858-W	Lazy O Ranch	Livestock	0.0023
47-00880-W	Frances G. Syfrett Ranch	Livestock	0.0001
47-00894-W	Lamb Island and Dinner Island	Livestock	0.0035
47-00895-W	Dixie Pasture and KICCO Ranch	Livestock	0.0047
47-00908-W	Platts Bluff at Kennedy Farms	Livestock	0.0621
47-00913-W	Kissimmee Oaks	Livestock	0.0013
47-00923-W	Ruff Diamond	Livestock	0.0564
47-00925-W	Pete Beatty Ranch	Livestock	0.042
47-00928-W	MICCO (Bassinger)	Livestock	0.0063
47-00931-W	Horse Farm (68)	Livestock	0.0107
47-00932-W	Cracker Trail Country Store	Public Water Supply	0.0016
47-00934-W	C Hooker Farm	Livestock	0.0019
47-00940-W	Watford Cattle Company	Livestock	0.0041
47-00943-W	Thoroughbred Estates	Landscape	0.0158
47-00959-W	Alton Chandler Civic Center	Public Water Supply	0.0001
47-00979-W	Bassinger Shop Calves	Livestock	0.003
47-00988-W	101 Ranch Hwy 98	Livestock	0.0024
47-01025-W	Rocking J E Ranch (Cattle)	Livestock	0.0220
47-0126-W	CNC Ranch	Livestock	0.0102

Permit Number	Project Name	Land Use	Average Daily Allocation (mgd)
47-01135-W	Corona Cattle Company	Livestock	0.0190
47-01149-W	Rocking E Ranch	Agriculture	0.1019
47-01157-W	Robert Monroe Arnold	Livestock	0.0066
47-01192-W	Yates Marsh Lease/~~Kenedy~~Kennedy Farms, Inc.	Livestock	0.0007
47-01193-W	Doug Marshall	Livestock	0.007
47-01241-W	Four K Ranch Lippencott	Livestock	0.0003
47-01270-W	Phitsini Elenburger	Agriculture	0.0242
47-01280-W	RMSCO Ranch	Agriculture	.0055
47-01298-W	Kennedy Farms, Inc. River Parcel	Livestock	0.0018
47-01373-W	Harmony Ranch	Nursery	.0121
47-01375-W	Camp Grace	Public Water Supply	0.0074
47-01380-W	C&R Groves	Agriculture	0.083
47-01394-W	Kissimmee Oaks Cattle	Livestock	0.0002
47-01401-W	Matt Johnson	Landscape	0.0033
47-01407-W	Robert Stark	Landscape	0.0065
47-01415-W	Chicken Coop	Agricultural	0.0008
48-02079-W	Southpark Circle Irrigation	Landscape	0.0106
48-02646-W	FedEx Ground	Landscape	0.0031
48-02663-W	Pedro Ordehi	Agricultural	0.0069
49-00450-W	Wild Florida	Public Water Supply	0.0155
49-00930-W	Marsh Landing	Landscape/Public Water Supply	0.003
49-00937-W	OGRVP, LLC	Public Water Supply	0.0133
49-02599-W	Lake Marian Restaurant	Public Water Supply	0.0001
49-01023-W	Joh-Vannah Nursery Inc	Nursery	0.0148
49-01041-W	Iglesia Bautista Central	Public Water Supply	0.0010
49-01135-W	Kissimmee Field Station	Public Water Supply	0.0041
49-01192-W	Flora Express Inc	Nursery	0.1397
49-01253-W	Les Murdock	Livestock	0.0001
49-01479-W	Adams Ranch	Livestock	0.0420
49-01674-W	Silver Spurs Club	Landscape/Public Water Supply/Livestock	0.0041
49-01678-W	Griffis Estates	Livestock	0.0003
49-01737-W	C E Outdoor Services Nursery	Nursery	0.0558
49-01827-W	Neptune Road Widening	Landscape	0.0092
49-01882-W	4433 O B T-Repair Shop	Public Water Supply	0.0002
49-01949-W	Sunshine Greenery Nursery	Nursery	0.0077
49-01985-W	Twin Lakes	Agricultural	0.17
49-02256-W	Fells Cove	Landscape	0.0058
49-02281-W	Premium Peach LLC	Agricultural	0.0044
49-02331-W	Home Rehab Source-Zuni Road	Landscape	0.0171
49-02348-W	Bexley Ranch/Lake Marian	Livestock	0.0172
49-02516-W	Poinciana Personal Storage	Landscape	0.0031
49-02703-W	El Maximo Livestock	Livestock	0.0241
53-00263-W	Lake Loft Well	Landscape	0.0184
53-00265-W	Highway 60 Plant Nursery	Nursery	0.0300
53-00271-W	Shady Oaks Limited Use WTF	Public Water Supply	0.0003
53-00297-W	Lake Hatchineha Ranch LLC	Public Water Supply/Livestock	0.0054
53-00327-W	ORFIBLU	Agricultural	0.0132
		Total	**5.~~705~~876**

mgd = million gallons per day.

Table 5-2. Surface water pumps near the reservation waterbodies.

Permit Number	Project Name	Land Use	Source	Average Daily Allocation (mgd)
28-00146-W	Fort Basinger Grove	Agriculture	C-41A Canal	0.29
28-00357-W	River Grove	Agriculture	C-38 Canal	5.71
49-00051-W	Lakeside Groves, Inc.	Agriculture	Live Oak Lake	0.23
49-00077-W	Number 4 Grove	Agriculture	Pearl Lake	0.50
49-00097-W	Turkey Hammock	Agriculture	Lake Kissimmee	3.23
49-00150-W	Macy Island Citrus	Agriculture	Lake Tohopekaliga	0.15
49-00776-W	Adams Ranch	Agriculture	Lake Marian	13.75
49-00938-W	Heart Bar Ranch Seed and Sod	Agriculture	On-site canal (drains to the C-34 Canal)	0.78
49-01409-W	Shingle Creek Stormwater Reuse	Public Water Supply	Shingle Creek	6.00
49-01960-W	Lakeshore Stormwater Augmentation	Public Water Supply	Lake Tohopekaliga	2.00
49-02330-W	Bexley Ranch/Lake Marian	Agriculture	Lake Marian	1.28
53-00031-W	Grove Number 91	Agriculture	Lake Pierce	0.42
53-00032-W	Chastain Block	Agriculture	Lake Pierce	0.18
49-02549-W	Lake Toho Restoration/AWS	Public Water Supply	East City Ditch/Mill Slough	8.22
			Total	**42.~~45~~74**

mgd = million gallons per day.

5.4.2 Downstream Threshold at S-65 for the Kissimmee River Restoration Project

An evaluation was performed to ensure future water withdrawals from the reservation waterbodies will not exceed a threshold that negatively affects downstream restored systems (i.e., KRRP) due to insufficient flows. The determination of an acceptable level of change in flows at the S-65 structure was based on the range of acceptability concept developed during earlier technical work for the Water Reservations that was peer reviewed in 2009. In the earlier technical work, the range of acceptability was applied to the river performance by selecting targets for the performance measures that represented an upper and lower range of hydrologic conditions that should be equally protective of fish and wildlife. The use of the upper and lower performance measure targets to create an upper and lower threshold target time series of discharge is described in more detail in Section 7 of SFWMD (2009).

Average discharge at the S-65 structure was 976 cfs for the lower threshold target time series and 1,077 cfs for the upper threshold time series. An acceptable level of change in discharge should be less than the difference between the average discharges of the upper and lower threshold target time series. Using the reduction from the upper threshold to the midpoint between the upper and lower threshold averages should provide a margin of safety. The midpoint between the average S-65 discharge for the upper and lower thresholds is 1,026.5 cfs. The difference between the average discharge for the upper threshold and the midpoint between the upper and lower threshold is 50.5 cfs. A reduction from the upper threshold to the midpoint is $(1{,}077 - 1{,}026.5)/1{,}026.5 \times 100\% = 5\%$. This suggests that a reduction of less than 5% should be acceptable to protect the water needed for fish and wildlife.

A conservative analysis was performed to look at a hypothetical reduction in flows at the S-65 structure from future withdrawals to determine what effect this would have on the KRRP performance measures. For this analysis, mean daily discharge was reduced 5% every day for a 41-year period (1965 to 2005). The effect of this hypothetical reduction in flows was evaluated by changes in the number of days (duration) of floodplain inundation and the duration of low flows.

The draft Water Reservation rules limit withdrawals within each UCOL reservation waterbody based on the WRL, while restricting all surface water withdrawals from the Headwaters Revitalization Lakes and the

Kissimmee River and floodplain. An added level of protection was incorporated into the draft Water Reservation rules, requiring an applicant demonstrate that its proposed withdrawal, individually and cumulatively with all withdrawal allocations permitted since 2005, do not reduce average discharges at the S-65 structure by more than 5% compared to the no-withdrawal scenario over a range of climatic variability between 1965 and 2005. In 2009, it was determined that a less than 5% reduction in average flows to the Kissimmee River would not result in impacts to the river. A water use permit was issued to Toho Water Authority in 2017 (Water Use Permit 49-02549-W; **Table 5-2**) that reduced the average cumulative discharges at S-65 by 0.82%. As a result, the reduction of future cumulative discharges at S-65 has been reduced to 4.18% (5% – 0.82% = 4.18%), which is reflected in the draft Water Reservation rules. This individual and cumulative downstream check at the S-65 structure provides an extra level of assurance that future water uses will not adversely affect the water needed for the protection of fish and wildlife in the Kissimmee River and Chain of Lakes or the ecological integrity goal of the KRRP.

5.4.3 Lake Okeechobee Constraint for the Lake Okeechobee Service Area

Restricted Allocation Area (RAA) criteria are established by rule for specific sources where there is insufficient water to meet projected needs. In October 2008, the SFWMD Governing Board adopted RAA criteria for the Lake Okeechobee Service Area (LOSA) (Subsection 3.2.1.F of the Applicant's Handbook (SFWMD 2015b)). The LOSA RAA criteria were established to address lower lake management levels and storage under the USACE's interim Lake Okeechobee Regulation Schedule (2008 LORS). The RAA criteria were incorporated into the Minimum Flow and Minimum Water Level (MFL) recovery strategy for Lake Okeechobee when the MFL strategy changed from prevention to recovery. **Figure 5-2** shows the spatial extent of the LOSA RAA. The 2008 amendment (SFWMD 2008) to Appendix H of the *2000 Lower East Coast Water Supply Plan* contains background information on the regulatory context for Lake Okeechobee's change to an MFL recovery strategy, the LOSA RAA, and future expectations for the lake's MFL status.

The LOSA RAA criteria generally limit surface water withdrawals from Lake Okeechobee and all surface waters hydraulically connected to the lake to base condition water uses occurring from April 1, 2001 to January 1, 2008. For surface water users in LOSA, studies and analyses supporting the 2008 LORS projected a decline in the physical level of certainty of agricultural uses reliant on lake water supplies, from a 1-in-10 year to a 1-in-6 year drought return frequency (SFWMD 2018).

Public comment received in 2015 from LOSA agricultural users expressed concerns that future withdrawals in the UKB would reduce their level of certainty below the 1-in-6 drought frequency currently predicted under 2008 LORS. To prevent this from occurring and to protect existing legal users within LOSA, a downstream Lake Okeechobee constraint has been incorporated into the draft Water Reservation rules.

The Applicant's Handbook (SFWMD 2015b) will be revised simultaneously with adoption of the draft Water Reservation rules [Chapter 40E-10, Florida Administrative Code] to include new criteria pertinent to water withdrawals from reservation and contributing waterbodies, including a requirement and criteria for water use permit applicants to demonstrate the proposed use will not impact existing legal users in LOSA. To provide such assurance, a permittee will be required to perform a daily downstream check of Lake Okeechobee stage prior to withdrawing surface water or groundwater from a reservation or contributing waterbody. Withdrawals can only occur when regulatory releases from Lake Okeechobee are being made to either the Caloosahatchee River or St. Lucie Estuary and other regulatory constraints are met.

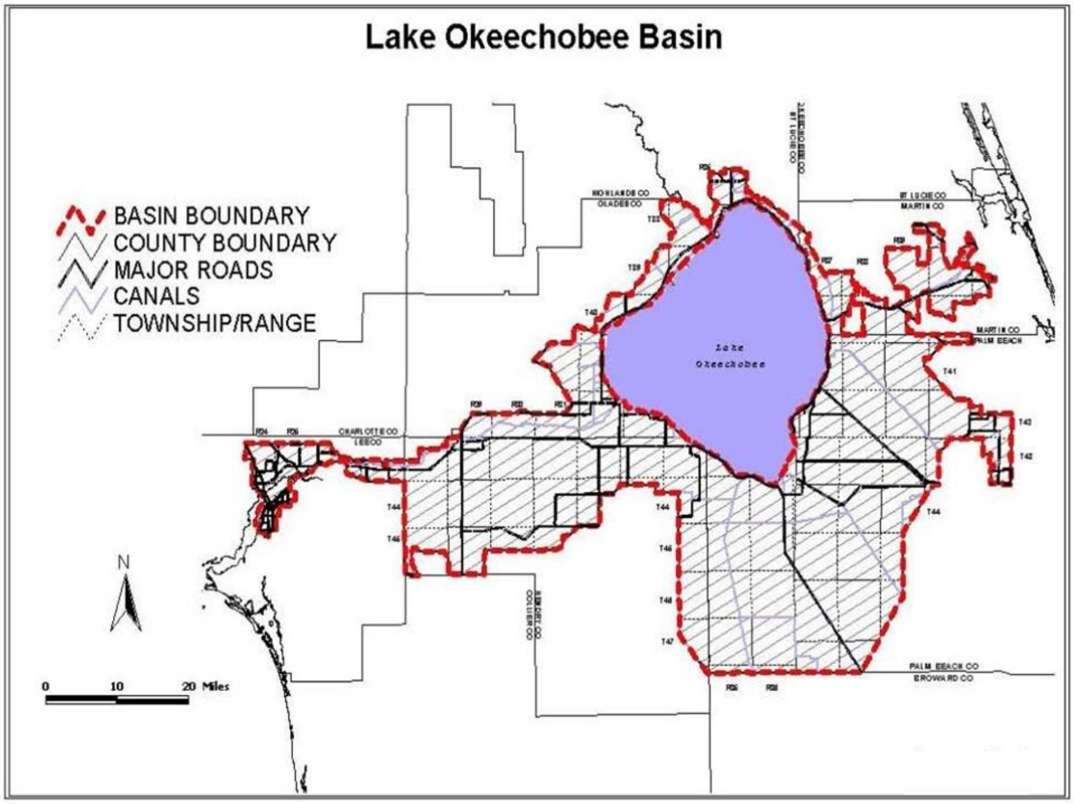


Figure 5-2. The Restricted Allocation Area rule boundary for the Lake Okeechobee Service Area.

5.5 Modeling Tool for Evaluating Future Water Use Withdrawals

To assist with the evaluation and permitting of future water use withdrawals, the Upper Kissimmee Operations Simulation (UK-OPS) Model was developed. The UK-OPS Model directly computes the allowable timing of proposed withdrawals consistent with the constraints and criteria in the draft Water Reservation rules. This section provides an overview of the UK-OPS Model and a hypothetical example withdrawal scenario to demonstrate the model capabilities and outputs. More detailed information regarding the UK-OPS Model is provided in **Appendix C**.

5.5.1 Overview of the Upper Kissimmee – Operations Simulation Model

The UK-OPS Model is a coarse-scale water management hydrologic simulation model developed to quickly test alternative water operation strategies. Additional model features were created to evaluate the effects of surface water withdrawals based on the draft Water Reservation rules.

The increasing utility and computational power of Microsoft Excel® made the spreadsheet software program a logical platform to build the UK-OPS Model. The model is a simple, daily time-step, continuous simulation model of the hydrology and operations in the primary UKB lakes. Analysts can use the UK-OPS Model to easily test a variety of operating strategies and quickly receive feedback of the performance for the primary lake management objectives.

The UK-OPS Model and documentation report were peer reviewed in November 2019. The model was deemed technically sound, appropriately developed, and usable for the intended applications. Technical details of the UK-OPS Model are provided in **Appendix C**. **Appendix D** contains the peer-review reports.

5.5.2 Sensitivity Analysis of Hypothetical Water Supply Withdrawals with Kissimmee Water Reservation Criteria

The UK-OPS Model investigated effects of hypothetical water supply withdrawals from UCOL waterbodies with the constraints and criteria in the draft Water Reservation rules. Water supply withdrawal reliability was assessed with and without the proposed Lake Okeechobee constraint discussed in **Section 5.4.3**. A sensitivity analysis was conducted to evaluate the effects of hypothetical water supply withdrawals from one UCOL reservation waterbody, Lake Tohopekaliga. Results of the sensitivity analysis are presented in the following sections. **Figures 5-3** and **5-4** illustrate example WRLs for East Lake Tohopekaliga and Lake Tohopekaliga, respectively. The red dashed line is a draft of the WRL (since modified as shown in **Section 5.3.5** and **Appendix B** as black lines), which was designed to protect the water needed for protection of fish and wildlife in the lake system. The general concept is that water withdrawals can occur if the lake stage is above the WRL. For example, if water withdrawals are contemplated from the Lakes Hart-Mary Jane reservation waterbody, then the daily stage must exceed the WRL for that day before a withdrawal can occur. A Lake Okeechobee constraint was added to the draft Water Reservations rules to prevent impacts to downstream users within LOSA. If the rule constraints are met, then withdrawals can occur on that day. The process to check these rule constraints repeats each day of the simulation.

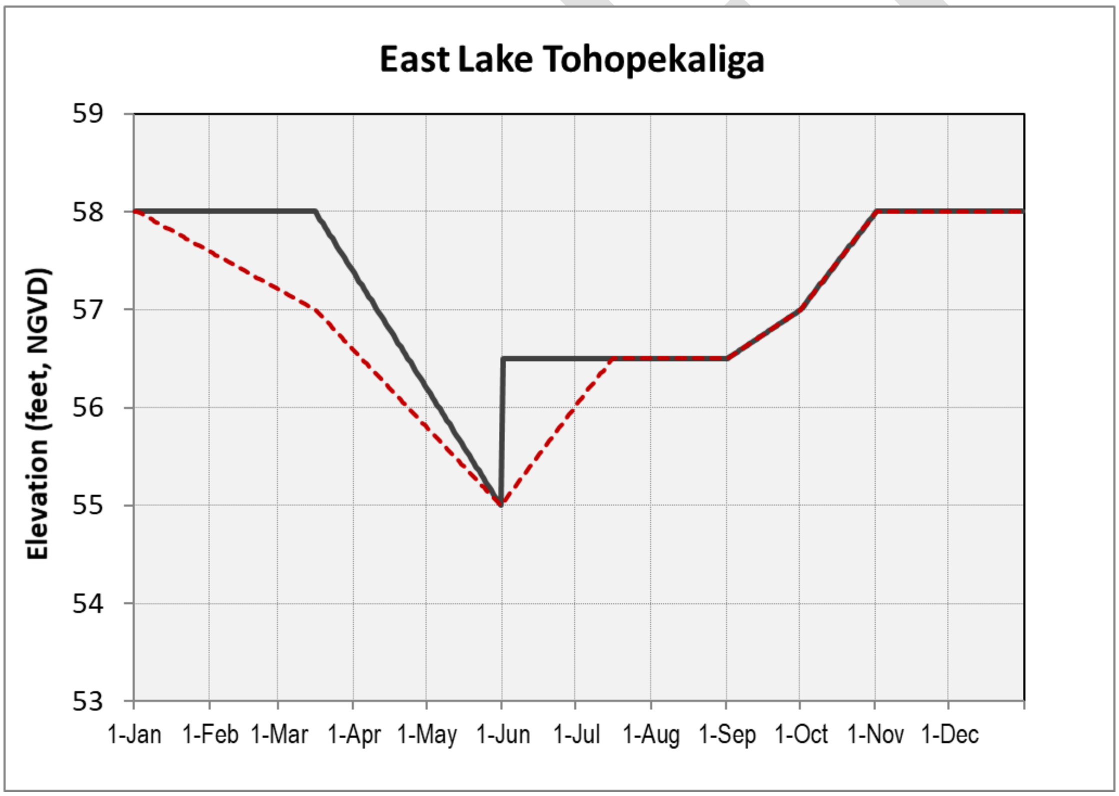


Figure 5-3. East Lake Tohopekaliga regulation schedule (black line) and a draft water reservation line (red dashed line).

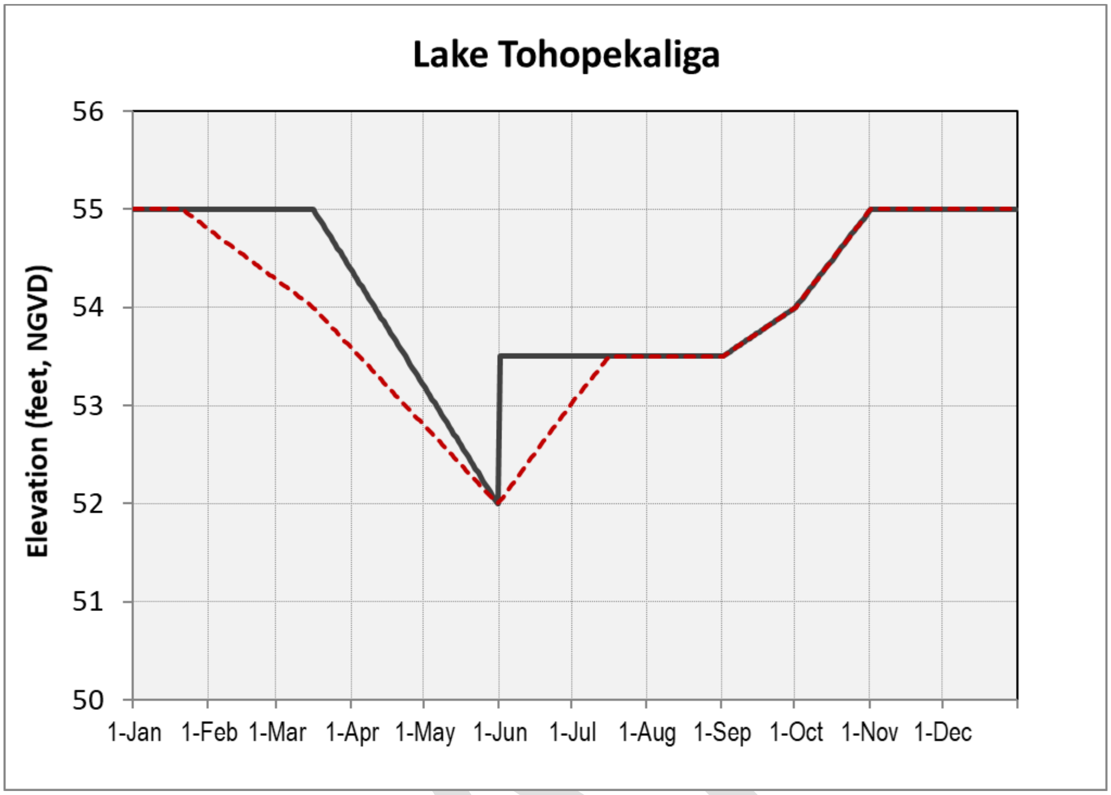


Figure 5-4. Lake Tohopekaliga regulation schedule (black line) and a draft water reservation line (red dashed line).

5.5.2.1 Baseline Scenario

The first scenario simulation (hereafter referred to as Base) was a baseline that used the authorized HRS and the standard regulation schedules for East Lake Tohopekaliga and Lake Tohopekaliga (**Figures 5-3** and **5-4**, respectively). No water supply withdrawals were assumed.

5.5.2.2 Water Supply Withdrawal Scenario 1

Scenario 1, hereafter WSmax, used the same assumptions as the Base but included water supply withdrawals from Lake Tohopekaliga. The capacity of the infrastructure needed to make the withdrawal was fixed at 64 mgd (99 cfs), but the daily withdrawal rate was subject to the constraints and criteria in the draft Water Reservation rules. No other water supply withdrawals from other lake systems were assumed in this hypothetical scenario.

5.5.2.3 Water Supply Withdrawal Scenario 2

Scenario 2, hereafter WSmaxL, was identical to Scenario 1 except for the addition of the Lake Okeechobee constraint. The Base simulation was used for the relative comparison. Comparison with WSmax also was informative. The Lake Okeechobee constraint was designed to limit adverse impacts to existing legal users in LOSA. Withdrawals from UCOL reservation waterbodies could reduce water availability downstream. The Lake Okeechobee constraint limits withdrawals from UCOL reservation waterbodies to occur only when regulatory releases from Lake Okeechobee are occurring to either the Caloosahatchee River or St. Lucie Estuary.

The approximation of the Lake Okeechobee constraint is depicted in **Figure 5-5**. When the stage is above the Low Sub-band of the 2008 LORS, indicating regulatory releases are being discharged to tide, the hydrograph is green. The hydrograph is red when the stage is below the Low Sub-band of the 2008 LORS, indicating relatively low water conditions with no regulatory discharge to tide. When the lake stage is red, the Lake Okeechobee constraint is not met and no water supply withdrawals can be made from reservation or contributing waterbodies. When the lake stage is green, indicating regulatory releases are occurring from Lake Okeechobee to either the Caloosahatchee River or St. Lucie Estuary, then the Lake Okeechobee constraint is met and withdrawals are allowed from reservation or contributing waterbodies, provided all other regulatory constraints (criteria) are met. This approximation of the Lake Okeechobee constraint is tied to the 2008 LORS when regulatory releases occur, but it can be modified as needed when a revised regulation schedule is implemented for Lake Okeechobee. The objective is to capture the timing of when regulatory releases are discharged to tide.

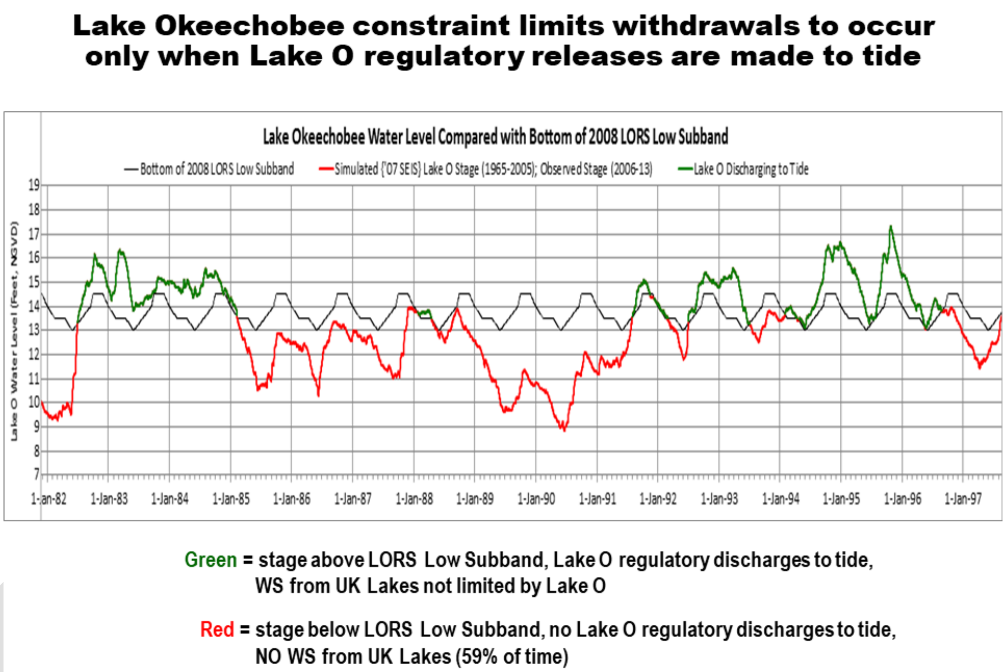


Figure 5-5. Lake Okeechobee constraint used by the UK-OPS Model.

5.5.2.4 Simulation Results

The UK-OPS Model simulations of the Base, WSmax, and WSmaxL scenarios revealed the effects of one possible withdrawal scenario on the constraints and criteria of the draft Water Reservation rules. The outputs examined and presented here are limited to comparisons of Lake Tohopekaliga water budgets and stage percentiles, S-65 annual flow, and water supply reliability.

Lake Tohopekaliga Water Budget

Figure 5-6 shows the Lake Tohopekaliga annual water budget for the WSmax and WSmaxL simulations. The water supply withdrawal component is shown for each simulation year and is small relative to the other water budget components. The WSmaxL scenario has less volume of withdrawal. Annual average withdrawal reduces from 39,000 acre-feet per year for WSmax to 19,000 acre-feet per year for WSMaxL, a 51% reduction. The reduction is due to the Lake Okeechobee constraint, which reduces the number of days surface water or groundwater withdrawals can be made.

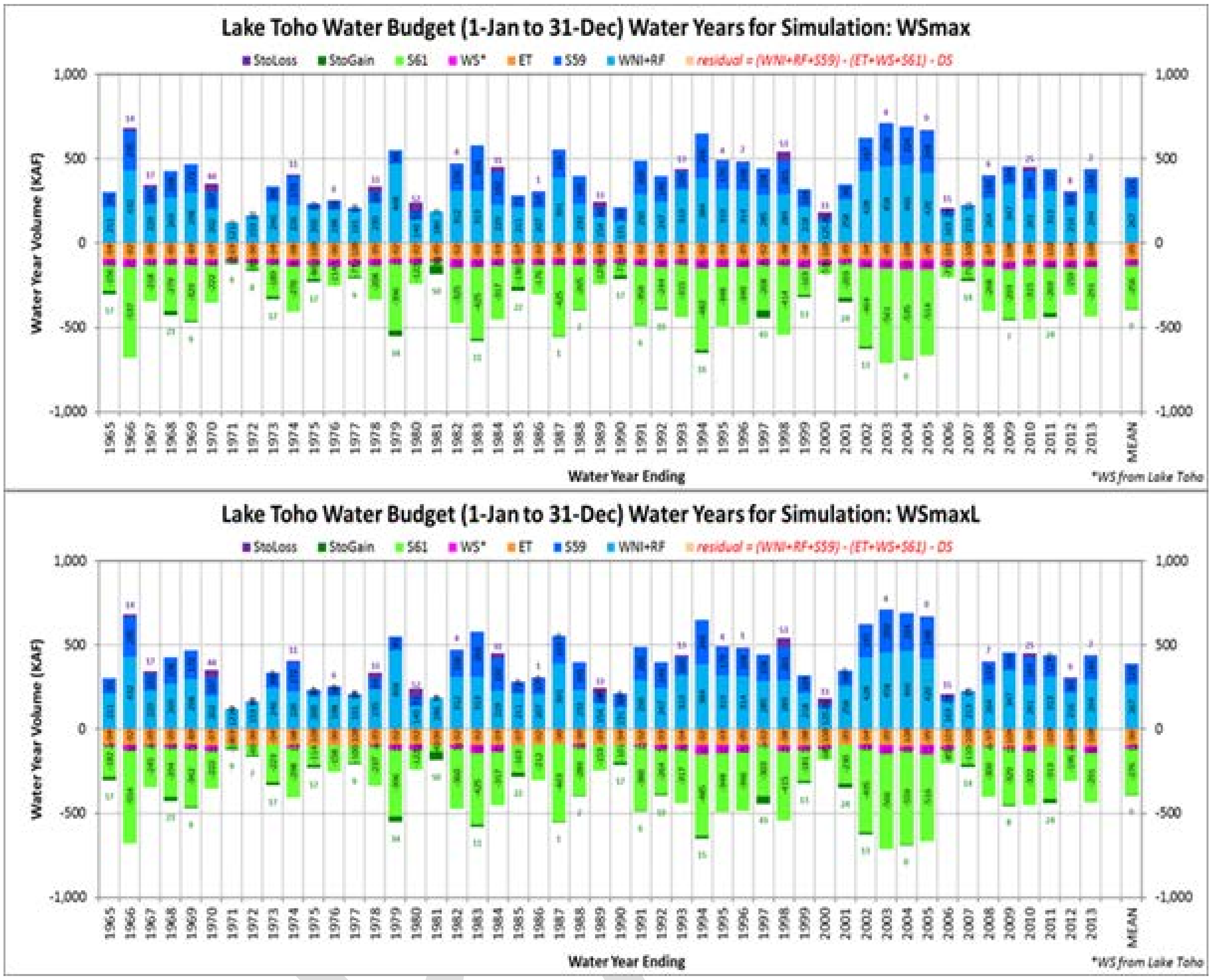


Figure 5-6. Water budget comparison of WSmax and WSmaxL for Lake Tohopekaliga.

Lake Tohopekaliga Stage Percentiles

Figure 5-7 compares the lake stage percentiles for the three simulations. Results demonstrated a downward shift in the percentiles of the WSmax scenario (red) relative to the Base (black). The WSmaxL scenario (green) falls between the other simulations because the withdrawals are less than those of the WSmax simulation.

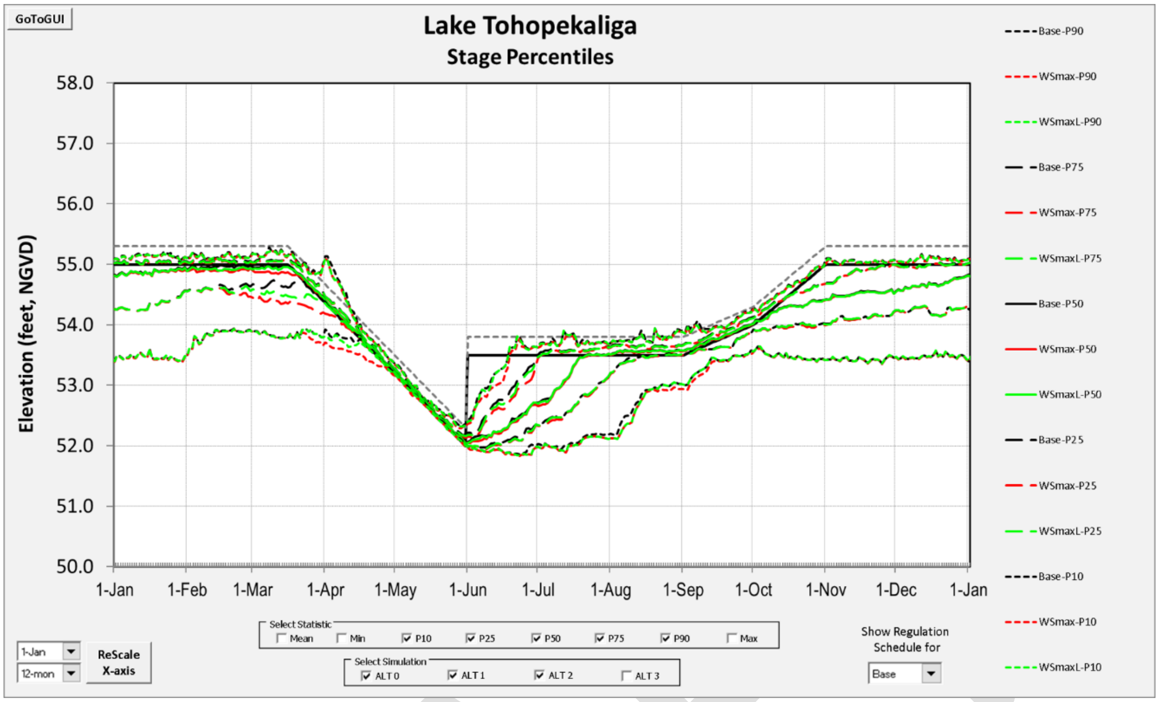


Figure 5-7. Lake Tohopekaliga stage percentiles.

S-65 Annual Flow

A key threshold for the draft Water Reservation rule criteria is that the reduction in mean annual flow for the 41-year simulation period cannot exceed 5%. This permitting criterion will be used for evaluating future withdrawals. This criterion is not, nor can it be, a criterion for real-time operations to determine if withdrawals can occur. This permitting criterion is evaluated at the time an applicant submits a water use permit application to ensure the proposed withdrawal does not impact restoration efforts associated with the KRRP or the water needed for protection of fish and wildlife.

Figure 5-8 shows the mean annual flow for the WSmax scenario is exactly -5.0%. The maximum withdrawal capacity of 64 mgd was determined by iteratively running the model until this limit was reached. Thus, if all future water supply withdrawals were to come from Lake Tohopekaliga, they could not exceed a total of 64 mgd. Withdrawals permitted in the future likely will be in various amounts and from any of the six lake systems that allow withdrawals, subject to the WRLs and downstream constraints. This is one reason why the UK-OPS Model is needed: to evaluate each proposed withdrawal in the context of the accumulated withdrawals that have already been permitted. As discussed previously, one water use permit recently was authorized, leaving only 4.18% of future reductions in the mean annual flow at the S-65 structure. Once the 5% threshold is reached, no further withdrawals will be permitted.

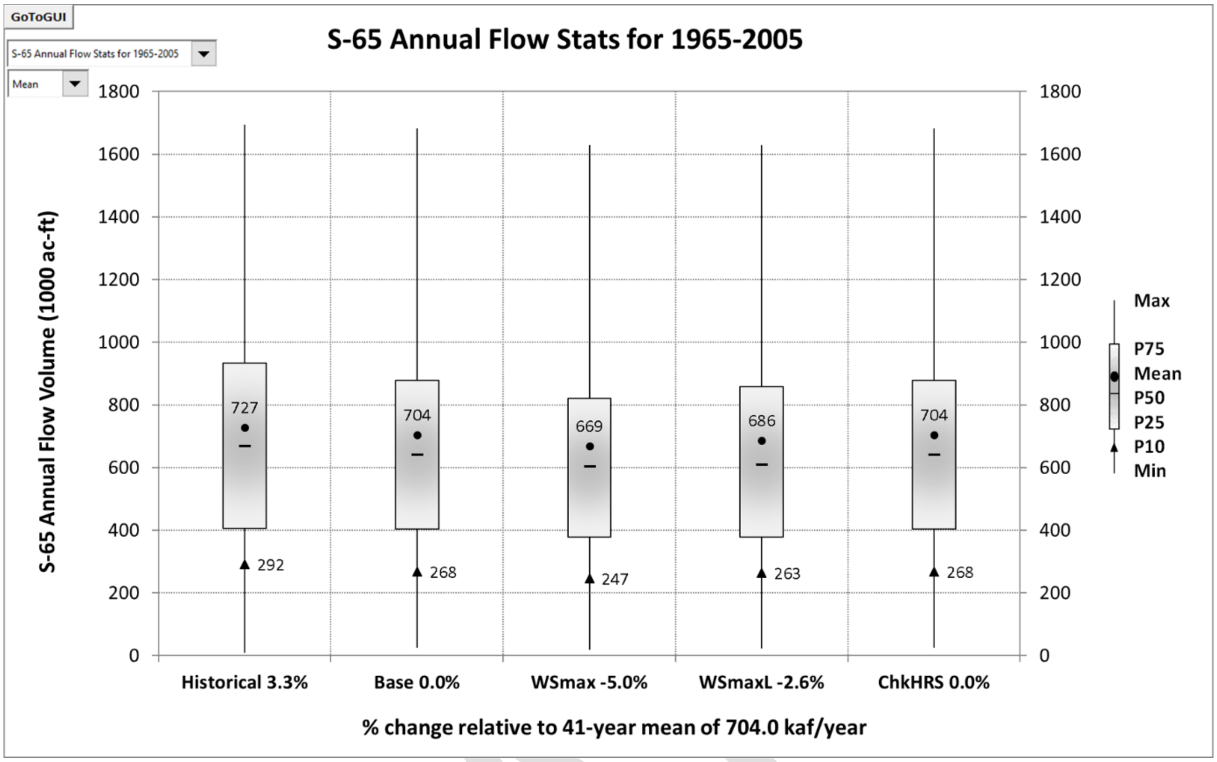


Figure 5-8. Annual flow at the S-65 structure.

Water Supply Reliability

The simulated water supply reliability information for the WSmax and WSmaxL scenarios are shown in **Tables 5-3** and **5-4**, respectively. The target reliability (percent of time water supply withdrawals occur) was set at 70%. Users can change this target to match the level of performance desired for their particular project. The table summaries show the reliability with the WSmax scenario is 8 calendar years out of the 49 years simulated. The WSmaxL scenario has only 4 years out of 49 years simulated that meet or exceed the 70% reliability target. This result illustrates the impact of the Lake Okeechobee constraint. A larger pump size can be tested to determine if supply targets can be better met. The reliability measures reflect the timing of withdrawals, but larger withdrawals could occur within the allowable days if they do not exceed the 5% limit described previously. These scenarios can be tested using the UK-OPS Model.

Table 5-3. Lake Tohopekaliga water supply reliability for the WSmax scenario.

Lake TOH Water Supply Reliability Table for WSmax

	No. of Days per Month with Lake Toho WS Withdrawals at 99.0 cfs (64.0 MGD)												Days	Vol(kaf)	AvgMGD	Percent of Time WS Withdrawal			
																CalYear	WetSeas	DrySeas	WatYear
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan-Dec	Jan-Dec	Jan-Dec	Jan-Dec	May-Oct	Nov-Apr	May-Apr
1965	0	16	31	30	31	1	9	31	8	7	0	14	178	34.96	31.21	48.8%	47.3%		
1966	23	28	31	30	31	14	31	31	30	15	0	0	264	51.85	46.29	72.3%	82.6%	74.1%	58.4%
1967	0	16	31	30	31	0	8	31	20	1	0	0	168	33.00	29.46	46.0%	49.5%	50.9%	62.7%
1968	0	0	0	25	31	26	30	31	10	0	0	0	153	30.05	26.75	41.8%	69.6%	26.3%	31.7%
1969	19	28	31	30	31	0	0	0	6	27	21	22	215	42.23	37.70	58.9%	34.8%	65.6%	64.7%
1970	31	28	31	30	31	9	0	10	0	0	0	0	170	33.39	29.81	46.6%	27.2%	91.5%	62.2%
1971	0	0	3	28	31	0	0	0	0	0	0	0	62	12.18	10.87	17.0%	16.8%	29.2%	22.2%
1972	0	0	13	30	31	0	6	23	6	0	0	0	109	21.41	19.06	29.8%	35.9%	34.7%	20.2%
1973	0	26	31	30	31	3	0	13	29	11	0	0	174	34.18	30.51	47.7%	47.3%	55.7%	41.9%
1974	0	14	31	30	31	2	30	31	30	4	0	0	203	39.87	35.59	55.6%	69.6%	50.0%	44.4%
1975	0	0	21	30	31	0	0	27	19	11	2	0	141	27.70	24.72	38.6%	47.8%	38.7%	49.0%
1976	4	29	31	30	31	19	28	29	26	2	0	0	229	44.98	40.04	62.6%	73.4%	59.6%	50.3%
1977	5	28	31	30	31	1	0	5	13	2	0	3	149	29.27	26.13	40.8%	28.3%	59.0%	62.7%
1978	19	28	31	30	31	0	6	29	3	0	0	0	177	34.77	31.04	48.5%	37.5%	67.0%	44.7%
1979	4	28	31	30	31	1	0	0	27	7	0	0	159	31.23	27.88	43.6%	35.9%	58.5%	44.4%
1980	20	29	31	30	31	3	0	0	0	0	0	0	144	28.28	25.18	39.3%	18.5%	66.2%	48.1%
1981	0	0	0	0	11	4	0	3	21	0	0	13	52	10.21	9.12	14.2%	21.2%	5.2%	9.3%
1982	25	28	31	30	31	30	31	31	28	13	0	0	278	54.60	48.74	76.2%	89.1%	74.5%	45.5%
1983	7	28	31	30	31	13	20	31	28	13	7	15	254	49.89	44.54	69.6%	73.9%	59.9%	71.2%
1984	31	29	31	30	31	3	27	30	4	0	0	0	216	42.43	37.77	59.0%	51.6%	81.7%	76.2%
1985	0	0	9	30	31	0	0	30	27	10	0	0	137	26.91	24.02	37.5%	53.3%	33.0%	36.7%
1986	30	28	31	30	31	0	0	23	12	0	0	0	185	36.34	32.44	50.7%	35.9%	70.8%	59.5%
1987	29	28	31	30	31	2	0	0	0	0	19	29	199	39.09	34.89	54.5%	17.9%	70.3%	50.4%
1988	18	29	31	30	30	0	0	12	26	0	2	28	206	40.46	36.02	56.3%	37.0%	87.3%	51.6%
1989	11	11	29	30	31	0	0	18	17	6	0	0	153	30.05	26.83	41.9%	39.1%	67.0%	49.0%
1990	0	5	31	30	31	0	0	20	0	0	0	0	117	22.98	20.51	32.1%	27.7%	45.8%	37.8%
1991	0	2	29	30	31	30	31	31	13	16	0	0	213	41.84	37.35	58.4%	82.6%	43.4%	30.7%
1992	0	22	31	30	31	13	20	27	29	19	6	27	255	50.09	44.59	69.7%	75.5%	53.5%	64.2%
1993	29	28	31	30	31	5	0	0	10	0	0	0	164	32.21	28.76	44.9%	25.0%	85.8%	79.5%
1994	2	28	31	30	31	23	25	31	30	16	28	31	306	60.10	53.65	83.8%	84.8%	57.5%	37.5%
1995	30	28	31	30	31	0	5	31	27	28	13	10	264	51.85	46.29	72.3%	66.3%	98.6%	91.5%
1996	30	29	31	30	31	30	23	21	19	5	0	0	249	48.91	43.54	68.0%	70.1%	81.7%	72.4%
1997	7	28	31	30	31	4	12	29	5	0	1	28	206	40.46	36.12	56.4%	44.0%	59.9%	61.6%
1998	31	28	31	30	31	2	0	0	5	3	0	0	161	31.62	28.23	44.1%	22.3%	84.9%	63.0%
1999	0	26	31	30	31	1	13	27	14	30	26	12	241	47.34	42.26	66.0%	63.0%	55.7%	35.1%
2000	18	29	31	30	31	0	0	9	7	0	0	0	155	30.45	27.10	42.3%	25.5%	83.1%	71.6%
2001	0	0	0	26	31	3	16	27	30	5	0	0	138	27.11	24.20	37.8%	60.9%	26.9%	20.0%
2002	0	24	31	30	31	22	31	31	30	3	12	28	273	53.62	47.87	74.8%	80.4%	54.7%	54.0%
2003	31	28	31	30	31	25	31	31	21	8	2	16	285	55.98	49.97	78.1%	79.9%	90.1%	84.4%
2004	21	29	31	30	31	0	12	29	30	31	26	12	282	55.39	49.31	77.0%	72.3%	75.1%	75.4%
2005	30	28	31	30	31	30	29	31	9	7	27	21	304	59.71	53.30	83.3%	74.5%	88.7%	79.5%
2006	10	28	31	30	31	0	2	12	21	0	0	0	165	32.41	28.93	45.2%	35.9%	84.0%	77.8%
2007	0	26	31	30	31	20	21	20	14	8	0	1	202	39.68	35.42	55.3%	62.0%	55.7%	41.9%
2008	10	29	31	30	31	0	8	30	23	4	0	0	196	38.50	34.27	53.6%	52.2%	62.0%	58.7%
2009	0	19	31	30	31	30	31	31	25	1	0	11	240	47.14	42.08	65.8%	81.0%	52.4%	48.2%
2010	16	28	31	30	31	30	19	2	0	0	0	0	187	36.73	32.79	51.2%	44.6%	69.3%	72.6%
2011	0	20	31	30	31	0	9	31	25	26	20	3	226	44.39	39.63	61.9%	66.3%	52.8%	44.7%
2012	4	27	31	30	31	6	28	29	29	13	0	0	228	44.78	39.87	62.3%	73.9%	68.5%	64.8%
2013	0	14	31	30	31	25	31	31	28	3	0	0	224	44.00	39.28	61.4%	81.0%	50.0%	57.8%
MEANS																			
48YR	11	21	27	29	31	9	13	21	17	7	4	7	197	38.71	34.53	54.0%	52.9%	61.5%	54.0%
41YR	12	21	27	29	30	8	12	21	16	7	5	8	195	38.27	34.14	53.4%	51.1%	61.9%	53.4%

SUMMARY STATISTICS	CalYear	WetSeas	DrySeas	WatYear
No. of years used for stats	49	49	48	48
Years used for stats	'65-'13	'65-'13	'66-'13	'66-'13
# Yrs with WS duration > 70%	8	15	16	11
Annual Exceedance Frequency	16.3%	30.6%	33.3%	22.9%
Return Period (1-in-Nyrs)	6.1	3.3	3.0	4.4

Table 5-4. Lake Tohopekaliga water supply reliability for the WSmaxL scenario.

Lake TOH Water Supply Reliability Table for WSmaxL																Percent of Time WS Withdrawal			
	No. of Days per Month with Lake Toho WS Withdrawals at 99.0 cfs (64.0 MGD)												Days	Vol(kaf)	AvgMGD	CalYear	WetSeas	DrySeas	WatYear
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan-Dec	Jan-Dec	Jan-Dec	Jan-Dec	May-Oct	Nov-Apr	May-Apr
1965	0	16	29	0	0	0	0	0	0	0	0	0	45	8.84	7.89	12.3%	0.0%		
1966	1	28	30	11	0	4	31	31	30	15	0	0	181	35.55	31.74	49.6%	60.3%	33.0%	19.2%
1967	0	16	15	0	0	0	0	0	0	0	0	0	31	6.09	5.44	8.5%	0.0%	14.6%	38.9%
1968	0	0	0	0	0	2	30	31	10	0	0	0	73	14.34	12.76	19.9%	39.7%	0.0%	0.0%
1969	0	0	22	26	22	0	0	0	6	27	21	22	146	28.68	25.60	40.0%	29.9%	33.0%	33.2%
1970	31	28	31	30	31	9	0	10	0	0	0	0	170	33.39	29.81	46.6%	27.2%	91.5%	59.7%
1971	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	13.7%
1972	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1973	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1974	0	0	0	0	0	0	0	29	30	4	0	0	63	12.37	11.05	17.3%	34.2%	0.0%	0.0%
1975	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	17.3%
1976	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1977	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1978	0	0	0	0	0	0	0	29	3	0	0	0	32	6.29	5.61	8.8%	17.4%	0.0%	0.0%
1979	4	28	31	30	31	1	0	0	27	7	0	0	159	31.23	27.88	43.6%	35.9%	58.5%	34.2%
1980	20	29	31	30	31	3	0	0	0	0	0	0	144	28.28	25.18	39.3%	18.5%	66.2%	48.1%
1981	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	9.3%
1982	0	0	0	0	0	1	31	31	28	13	0	0	104	20.43	18.24	28.5%	56.5%	0.0%	0.0%
1983	7	28	31	30	31	13	20	31	28	13	7	15	254	49.89	44.54	69.6%	73.9%	59.9%	54.8%
1984	31	29	31	30	31	3	27	30	4	0	0	0	216	42.43	37.77	59.0%	51.6%	81.7%	76.2%
1985	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	26.0%
1986	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1987	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1988	5	28	31	16	0	0	0	0	0	0	0	0	80	15.71	13.99	21.9%	0.0%	37.6%	21.9%
1989	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1990	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1991	0	0	0	0	0	0	0	30	13	16	0	0	59	11.59	10.35	16.2%	32.1%	0.0%	0.0%
1992	0	20	0	0	0	0	22	27	29	19	6	27	150	29.46	26.23	41.0%	52.7%	9.4%	21.6%
1993	29	28	31	30	31	5	0	0	0	0	0	0	154	30.25	27.00	42.2%	19.6%	85.8%	67.9%
1994	1	28	31	20	31	23	25	31	30	16	28	31	295	57.94	51.73	80.8%	84.8%	52.4%	31.8%
1995	30	28	31	30	31	0	5	31	27	28	13	10	264	51.85	46.29	72.3%	66.3%	98.6%	91.5%
1996	30	29	31	30	24	30	23	16	0	0	0	0	213	41.84	37.25	58.2%	50.5%	78.4%	72.4%
1997	0	0	0	0	0	0	0	0	2	0	0	21	23	4.52	4.03	6.3%	1.1%	0.0%	25.5%
1998	31	28	31	30	31	2	0	0	1	4	0	0	158	31.03	27.70	43.3%	20.7%	81.1%	39.2%
1999	0	26	26	0	0	0	8	7	14	30	26	12	149	29.27	26.13	40.8%	32.1%	24.5%	24.7%
2000	18	29	31	10	0	0	0	0	0	0	0	0	88	17.28	15.39	24.0%	0.0%	59.2%	50.5%
2001	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
2002	0	25	2	0	0	0	7	31	30	3	0	21	119	23.37	20.87	32.6%	38.6%	12.7%	7.4%
2003	31	28	31	22	12	27	31	31	21	8	2	16	260	51.07	45.59	71.2%	70.7%	68.4%	55.9%
2004	21	29	23	0	0	0	0	0	16	31	26	12	158	31.03	27.63	43.2%	25.5%	42.7%	60.4%
2005	30	25	31	30	22	30	29	31	9	7	27	21	292	57.35	51.20	80.0%	69.6%	83.0%	55.1%
2006	10	28	31	30	4	0	0	0	0	0	0	0	103	20.23	18.06	28.2%	2.2%	71.2%	75.3%
2007	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	1.1%
2008	0	0	0	0	0	0	0	4	23	4	0	0	31	6.09	5.42	8.5%	16.8%	0.0%	0.0%
2009	0	0	0	0	0	0	0	31	25	1	0	0	57	11.20	9.99	15.6%	31.0%	0.0%	8.5%
2010	0	11	31	30	31	30	19	2	0	0	0	0	154	30.25	27.00	42.2%	44.6%	48.6%	35.3%
2011	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	22.5%
2012	0	0	0	0	0	0	0	0	29	13	0	0	42	8.25	7.34	11.5%	22.8%	0.0%	0.0%
2013	0	14	31	30	31	25	31	31	28	3	0	0	224	44.00	39.28	61.4%	81.0%	50.0%	32.1%
MEANS																			
48YR	7	12	14	10	9	4	7	11	9	5	3	4	96	18.80	16.77	26.2%	24.6%	27.9%	26.2%
41YR	8	13	14	10	9	4	7	11	9	6	4	5	100	**19.55**	**17.44**	**27.3%**	24.6%	29.7%	27.3%

SUMMARY STATISTICS	CalYear	WetSeas	DrySeas	WatYear
No. of years used for stats	49	49	48	48
Years used for stats	'65-'13	'65-'13	'66-'13	'66-'13
# Yrs with WS duration > 70%	4	4	8	4
Annual Exceedance Frequency	8.2%	8.2%	16.7%	8.3%
Return Period (1-in-Nyrs)	12.3	12.3	6.0	12.0

Lake TOH Water Supply Reliability Table for WSmaxL

No. of Days per Month with Lake Toho WS Withdrawals at 99.0 cfs (64.0 MGD)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Days Jan-Dec	Vol(kaf) Jan-Dec	AvgMGD Jan-Dec	Percent of Time WS Withdrawal CalYear Jan-Dec	WetSeas May-Oct	DrySeas Nov-Apr	WatYear May-Apr
1965	0	16	29	0	0	0	0	0	0	0	0	0	45	8.84	7.89	12.3%	0.0%		
1966	1	28	30	11	0	4	31	31	30	15	0	0	181	35.55	31.74	49.6%	60.3%	33.0%	19.2%
1967	0	16	15	0	0	0	0	0	0	0	0	0	31	6.09	5.44	8.5%	0.0%	14.6%	38.9%
1968	0	0	0	0	0	2	30	31	10	0	0	0	73	14.34	12.76	19.9%	39.7%	0.0%	0.0%
1969	0	0	22	26	22	0	0	0	6	27	21	22	146	28.68	25.60	40.0%	29.9%	33.0%	33.2%
1970	31	28	31	30	31	9	0	10	0	0	0	0	170	33.39	29.81	46.6%	27.2%	91.5%	59.7%
1971	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	13.7%
1972	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1973	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1974	0	0	0	0	0	0	0	29	30	4	0	0	63	12.37	11.05	17.3%	34.2%	0.0%	0.0%
1975	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	17.3%
1976	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1977	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1978	0	0	0	0	0	0	0	29	3	0	0	0	32	6.29	5.61	8.8%	17.4%	0.0%	0.0%
1979	4	28	31	30	31	1	0	0	27	7	0	0	159	31.23	27.88	43.6%	35.9%	58.5%	34.2%
1980	20	29	31	30	31	3	0	0	0	0	0	0	144	28.28	25.18	39.3%	18.5%	66.2%	48.1%
1981	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	9.3%
1982	0	0	0	0	0	1	31	31	28	13	0	0	104	20.43	18.24	28.5%	56.5%	0.0%	0.0%
1983	7	28	31	30	31	13	20	31	28	13	7	15	254	49.89	44.54	69.6%	73.9%	59.9%	54.8%
1984	31	29	31	30	31	3	27	30	4	0	0	0	216	42.43	37.77	59.0%	51.6%	81.7%	76.2%
1985	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	26.0%
1986	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1987	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1988	5	28	31	16	0	0	0	0	0	0	0	0	80	15.71	13.99	21.9%	0.0%	37.6%	21.9%
1989	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1990	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1991	0	0	0	0	0	0	0	30	13	16	0	0	59	11.59	10.35	16.2%	32.1%	0.0%	0.0%
1992	0	20	0	0	0	0	22	27	29	19	6	27	150	29.46	26.23	41.0%	52.7%	9.4%	21.6%
1993	29	28	31	30	31	5	0	0	0	0	0	0	154	30.25	27.00	42.2%	19.6%	85.8%	67.9%
1994	1	28	31	20	31	23	25	31	30	16	28	31	295	57.94	51.73	80.8%	84.8%	52.4%	31.8%
1995	30	28	31	30	31	0	5	31	27	28	13	10	264	51.85	46.29	72.3%	66.3%	98.6%	91.5%
1996	30	29	31	30	24	30	23	16	0	0	0	0	213	41.84	37.25	58.2%	50.5%	78.4%	72.4%
1997	0	0	0	0	0	0	0	0	2	0	0	21	23	4.52	4.03	6.3%	1.1%	0.0%	25.5%
1998	31	28	31	30	31	2	0	0	1	4	0	0	158	31.03	27.70	43.3%	20.7%	81.1%	39.2%
1999	0	26	26	0	0	0	8	7	14	30	26	12	149	29.27	26.13	40.8%	32.1%	24.5%	24.7%
2000	18	29	31	10	0	0	0	0	0	0	0	0	88	17.28	15.39	24.0%	0.0%	59.2%	50.5%
2001	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
2002	0	25	2	0	0	0	7	31	30	3	0	21	119	23.37	20.87	32.6%	38.6%	12.7%	7.4%
2003	31	28	31	22	12	27	31	31	21	8	2	16	260	51.07	45.59	71.2%	70.7%	68.4%	55.9%
2004	21	29	23	0	0	0	0	0	16	31	26	12	158	31.03	27.63	43.2%	25.5%	42.7%	60.4%
2005	30	25	31	30	22	30	29	31	9	7	27	21	292	57.35	51.20	80.0%	69.6%	83.0%	55.1%
2006	10	28	31	30	4	0	0	0	0	0	0	0	103	20.23	18.06	28.2%	2.2%	71.2%	75.3%
2007	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	1.1%
2008	0	0	0	0	0	0	0	4	23	4	0	0	31	6.09	5.42	8.5%	16.8%	0.0%	0.0%
2009	0	0	0	0	0	0	0	31	25	1	0	0	57	11.20	9.99	15.6%	31.0%	0.0%	8.5%
2010	0	11	31	30	31	30	19	2	0	0	0	0	154	30.25	27.00	42.2%	44.6%	48.6%	35.3%
2011	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	22.5%
2012	0	0	0	0	0	0	0	0	29	13	0	0	42	8.25	7.34	11.5%	22.8%	0.0%	0.0%
2013	0	14	31	30	31	25	31	31	28	3	0	0	224	44.00	39.28	61.4%	81.0%	50.0%	32.1%
MEANS																			
48YR	7	12	14	10	9	4	7	11	9	5	3	4	96	18.80	16.77	26.2%	24.6%	27.9%	26.2%
41YR	8	13	14	10	9	4	7	11	9	6	4	5	100	**19.55**	**17.44**	**27.3%**	24.6%	29.7%	27.3%

SUMMARY STATISTICS	CalYear	WetSeas	DrySeas	WatYear
No. of years used for stats	49	49	48	48
Years used for stats	'65-'13	'65-'13	'66-'13	'66-'13
# Yrs with WS duration > 70%	4	4	8	4
Annual Exceedance Frequency	8.2%	8.2%	16.7%	8.3%
Return Period (1-in-Nyrs)	12.3	12.3	6.0	12.0

The UK-OPS Model will be used as a regulatory tool by water use permit applicants and the SFWMD to ensure permitting thresholds needed to protect fish and wildlife are not exceeded by future withdrawals.

The UK-OPS Model also can be used as a planning tool to help potential users understand the reliability of a water source in the future. An independent scientific peer review was conducted on the UK-OPS Model in November 2019. The SFWMD received a positive peer review, and the reviewers confirmed the model was appropriately developed for its intended purpose. More information regarding the UK-OPS Model documentation report and the peer review are contained in **Appendices C** and **D**.

The Central Florida Water Initiative (2015) regional water supply plan developed by multiple state agencies, water management districts, and stakeholders indicated there will be increasing need for new water supplies in Central Florida to meet future growth and potentially augment existing sources within and beyond SFWMD boundaries in the coming years. Unreserved water, above that needed for protection of fish and wildlife in the UCOL reservation waterbodies, could be allocated to meet some of the water supply needs in Central Florida.

5.6 Summary

All unallocated surface water in the Kissimmee River and in the Headwaters Revitalization Lakes up to the stages in the HRS at S-65 (**Appendix B**, Figure B-7 and Table B-7) will be reserved. The Water Reservation is needed for protection of fish and wildlife and to ensure successful completion and implementation of the KRRP. The approach used to establish the WRLs within each UCOL waterbody was presented. The approach uses data from established hydrologic patterns for fish and wildlife and their respective habitats, which considers seasonality, duration, seasonal highs and lows, interannual variability, and other factors. The recession and ascension rates associated with the WRLs protect the breeding season and reproductive requirements of fish and wildlife, including listed species (e.g., Snail Kites).

Each reservation waterbody in the UCOL has a unique WRL based on historical inundation patterns and water management practices that fish and wildlife have adapted to since the regulation schedules were implemented. The WRLs show the water needed for fish and wildlife, while the water above this line is available for allocation to meet future water demands within Central Florida.

The UK-OPS Model was developed as a regulatory tool to ensure water needed for fish and wildlife is protected and the permitting threshold at the S-65 structure is not exceeded. Several model runs were presented to demonstrate model utility. The model is expected to be used by permittees and SFWMD regulatory staff in the future. The UK-OPS Model was evaluated by independent scientific peer reviewers.

The draft Water Reservation rules will prohibit new and increased uses of surface water from the Headwaters Revitalization Lakes and the Kissimmee River reservation waterbodies and limit the availability of future water use from UCOL reservation and contributing waterbodies. The draft Water Reservation rules will protect against future water use impacts and provide assurance that the water needed for fish and wildlife will be protected. Once in effect, the SFWMD's water use permitting program will use the Water Reservation rules and implementing criteria to ensure water use permit applicants do not withdraw reserved water.

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APPENDIX A: WATER RESERVATION WATERBODIES AND CONTRIBUTING AREAS

For the proposed Kissimmee River and Chain of Lakes Water Reservations, a reservation waterbody contains the fish and wildlife protected by the Water Reservation rules, and is where fish and wildlife roost, feed and forage, breed and nest, or shelter. These needs were considered when determining the quantity of water needed to protect fish and wildlife in the Kissimmee River and Chain of Lakes.

Many reservation waterbodies are connected directly or indirectly to other natural or man-made surface waterbodies that contribute water to reservation waterbodies but are not considered reservation waterbodies themselves. Draft amendments to Rule 40E-10.021, Florida Administrative Code, define a contributing waterbody as "all wetlands and other surface waters, including canals and ditches, that contribute surface water to a reservation waterbody." Contributing waterbodies continuously or intermittently provide water needed to maintain an adequate hydrologic regime for the protection of fish and wildlife in the reservation waterbodies to which they are connected.

This appendix lists (**Table A-1**) and depicts (**Figures A-1** through **A-9**) the reservation and contributing waterbodies of the proposed Kissimmee River and Chain of Lakes Water Reservations. The waterbodies are further described and discussed in the main report and other appendices and in draft implementation rules for Section 3.11.5 of the *Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District* (Applicant's Handbook; SFWMD 2015) and Chapter 40E-10, Florida Administrative Code, that are pertinent to the Kissimmee River and Chain of Lakes Water Reservations. Other wetlands and surface waters not specifically included in the Kissimmee River and Chain of Lakes Water Reservations are protected to a "no harm" standard under Section 3.3 of the Applicant's Handbook (SFWMD 2015).

Table A-1. Kissimmee River and Chain of Lakes Water Reservations waterbody list, as shown in **Figures A-1** through **A-9**, sorted by watershed and map identification number.

Waterbody Number	Waterbody Name	Waterbody Type
Lakes Hart-Mary Jane		
1	Lake Whippoorwill	Reservation
2	Whippoorwill Canal	Reservation
3	Lake Hart	Reservation
4	C-29 Canal	Reservation
5	Lake Mary Jane	Reservation
6	C-29A Canal north of S-62	Reservation
7	C-30 Canal north of S-57	Reservation
Lake Myrtle-Preston-Joel		
8	C-30 Canal south of S-57	Reservation
9	Lake Myrtle	Reservation
10	Myrtle/Preston Canal	Reservation
11	Lake Preston	Reservation
12	C-32B Canal	Reservation
13	Lake Joel	Reservation
14	C-32C Canal north of S-58	Reservation

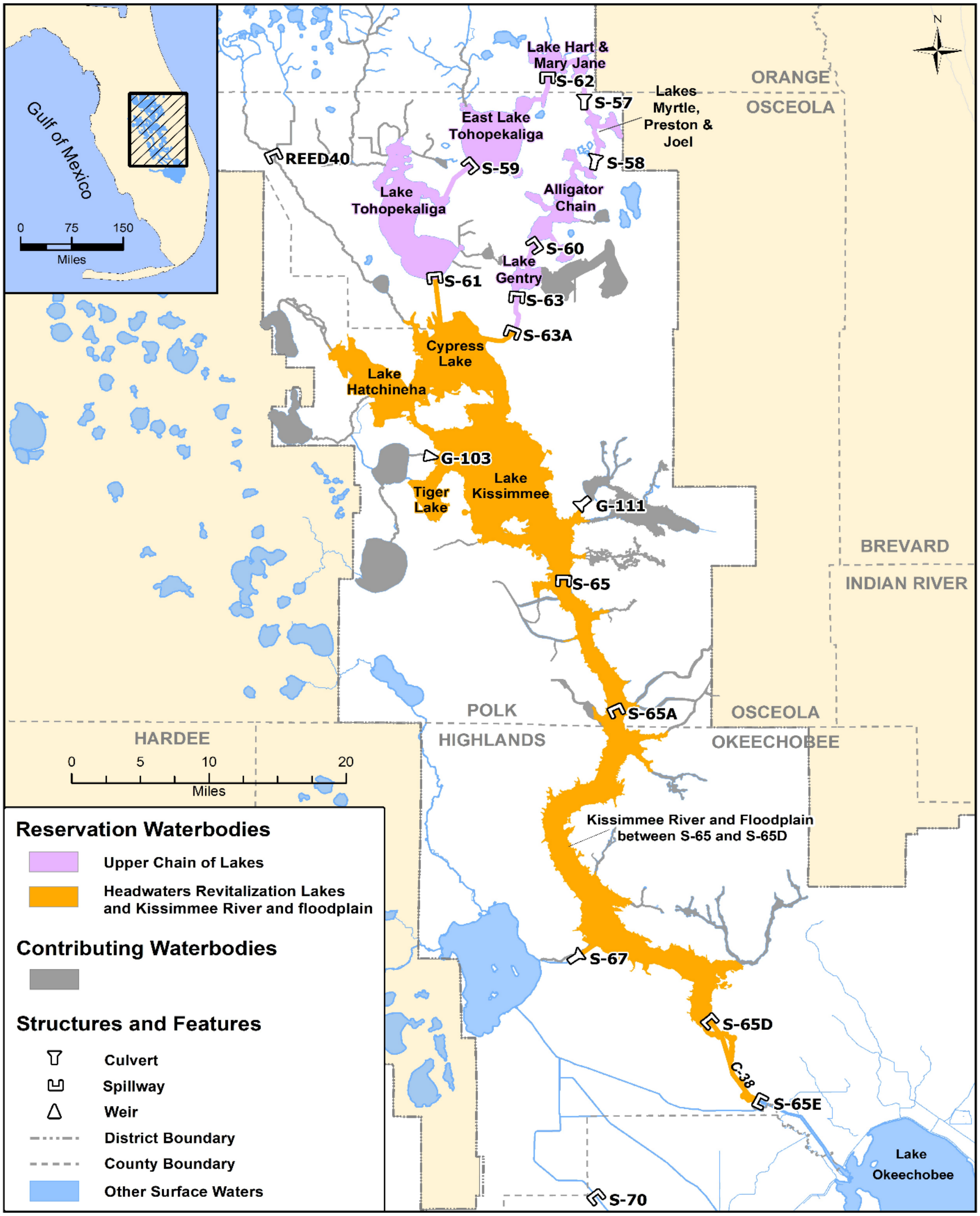
Waterbody Number	Waterbody Name	Waterbody Type
East Lake Tohopekaliga		
15	C-29A Canal south of S-62	Reservation
16	Ajay Lake	Reservation
17	C-29B Canal	Reservation
18	Fells Cove	Reservation
19	Boggy Creek	Contributing
20	East Lake Tohopekaliga	Reservation
21	Runnymede Canal	Reservation
22	Lake Runnymede	Reservation
23	C-31 Canal northeast of S-59	Reservation
Lake Tohopekaliga		
24	C-31 Canal southwest of S-59	Reservation
25	Fish Lake	Contributing
26	Bass Slough	Contributing
27	Partin Canal	Contributing
28	Mill Slough	Contributing
29	East City Ditch	Contributing
30	West City Ditch	Contributing
31	Shingle Creek including Western Branch (West Shingle Creek)	Contributing
32	Lake Tohopekaliga	Reservation
33	WPA Canal	Contributing
34	Gator Bay Branch	Contributing
35	Fanny Bass Ditch	Contributing
36	Fanny Bass Pond	Contributing
37	Drawdy Bay Ditch	Contributing
Alligator Chain of Lakes		
38	C-33 Canal north of S-60	Reservation
39	Alligator Lake	Reservation
40	Brick Canal	Reservation
41	Brick Lake	Reservation
42	Buck Slough	Contributing
43	Buck Lake	Contributing
44	Live Oak Lake	Reservation
45	Live Oak Canal	Reservation
46	Sardine Lake	Reservation
47	Sardine Canal	Reservation
48	C-32G Canal	Reservation
49	Lake Lizzie	Reservation
50	C-32F Canal	Reservation
51	Lake Center	Reservation
52	Center-Coon Canal	Reservation
53	Coon Lake	Reservation
54	C-32D Canal	Reservation
55	Trout Lake	Reservation
56	C-32C Canal south of S-58	Reservation

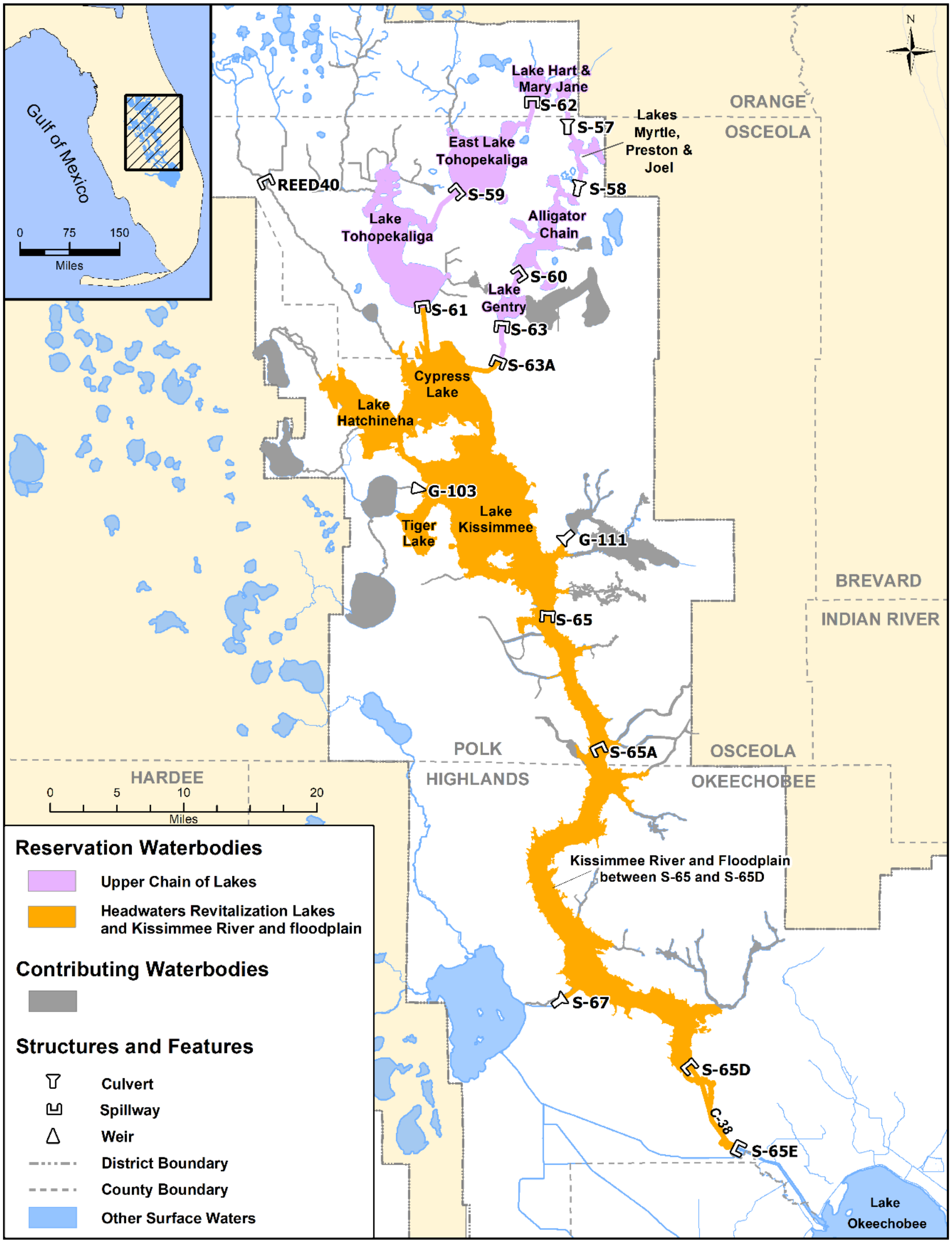
Waterbody Number	Waterbody Name	Waterbody Type
Lake Gentry		
57	C-34 Canal north of S-63	Reservation
58	Lake Gentry	Reservation
59	Big Bend Swamp	Contributing
60	Big Bend Swamp Canal/Gentry Ditch	Contributing
61	C-33 Canal south of S-60	Reservation
Headwaters Revitalization Lakes		
62	C-35 Canal south of S-61	Reservation
63	Cypress Lake	Reservation
64	C-34 Canal south of S-63A	Reservation
65	C-34 Canal north of S-63A	Reservation
66	Lake Russell	Contributing
67	Lower Reedy Creek south of REED40	Contributing
68	Upper Reedy Creek north of REED40	Contributing
69	Bonnet Creek	Contributing
70	C-36 Canal	Reservation
71	Lake Hatchineha	Reservation
72	Lake Marion Creek	Contributing
73	Lake Marion	Contributing
74	Catfish Creek	Contributing
75	Lake Pierce	Contributing
76	C-37 Canal	Reservation
77	Lake Kissimmee	Reservation
78	Zipprer Canal east of G-103	Reservation
79	Zipprer Canal west of G-103	Contributing
80	Lake Rosalie	Contributing
81	Weohyakapka Creek	Contributing
82	Lake Weohyakapka	Contributing
83	Tiger Lake	Reservation
84	Tiger Creek	Reservation
85	Otter Slough	Contributing
86	Jackson Canal south of G-111	Reservation
87	Jackson Canal north of G-111	Contributing
88	Lake Jackson	Contributing
89	Parker Hammock Slough	Contributing
90	Lake Marian	Contributing
91	Fodderstack Slough	Contributing
92	No Name Slough	Contributing
Kissimmee River Pool A*		
93	Buttermilk Slough	Contributing
94	Packingham Slough	Contributing
95	Ice Cream Slough	Contributing
96	Blanket Bay Slough	Contributing
97	Armstrong Slough	Contributing

Waterbody Number	Waterbody Name	Waterbody Type
Kissimmee River Pool B/C/D*		
98	Tick Island Slough	Contributing
99	Pine Island Slough	Contributing
100	Sevenmile Slough	Contributing
101	Starvation Slough	Contributing
102	Oak Creek	Contributing
103	Ash Slough	Contributing
104	Gore Slough	Contributing
105	Fish Slough	Contributing
106	Cypress Slough	Contributing
107	Istokpoga Canal and floodplain east of S-67	Reservation
108	Istokpoga Creek west of S-67	Contributing
Kissimmee River Pool E*		
109	C-38 Canal and remnant river channels from S-65 to S-65E	Reservation
Kissimmee River Pools A-E*		
110	Kissimmee River and floodplain between S-65 and S-65D	Reservation

* Currently, the Kissimmee River is divided into three pools (A, B/C/D, and E) by a series of combined locks and spillways. The water level in each pool is regulated according to an interim regulation schedule.

Disclaimer: Features shown in the following figures are cartographic representations and do not supersede legal descriptions or other regulatory criteria used to define such features on the ground.





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2505 Figure A-1. Kissimmee River and Chain of Lakes reservation and contributing waterbodies.

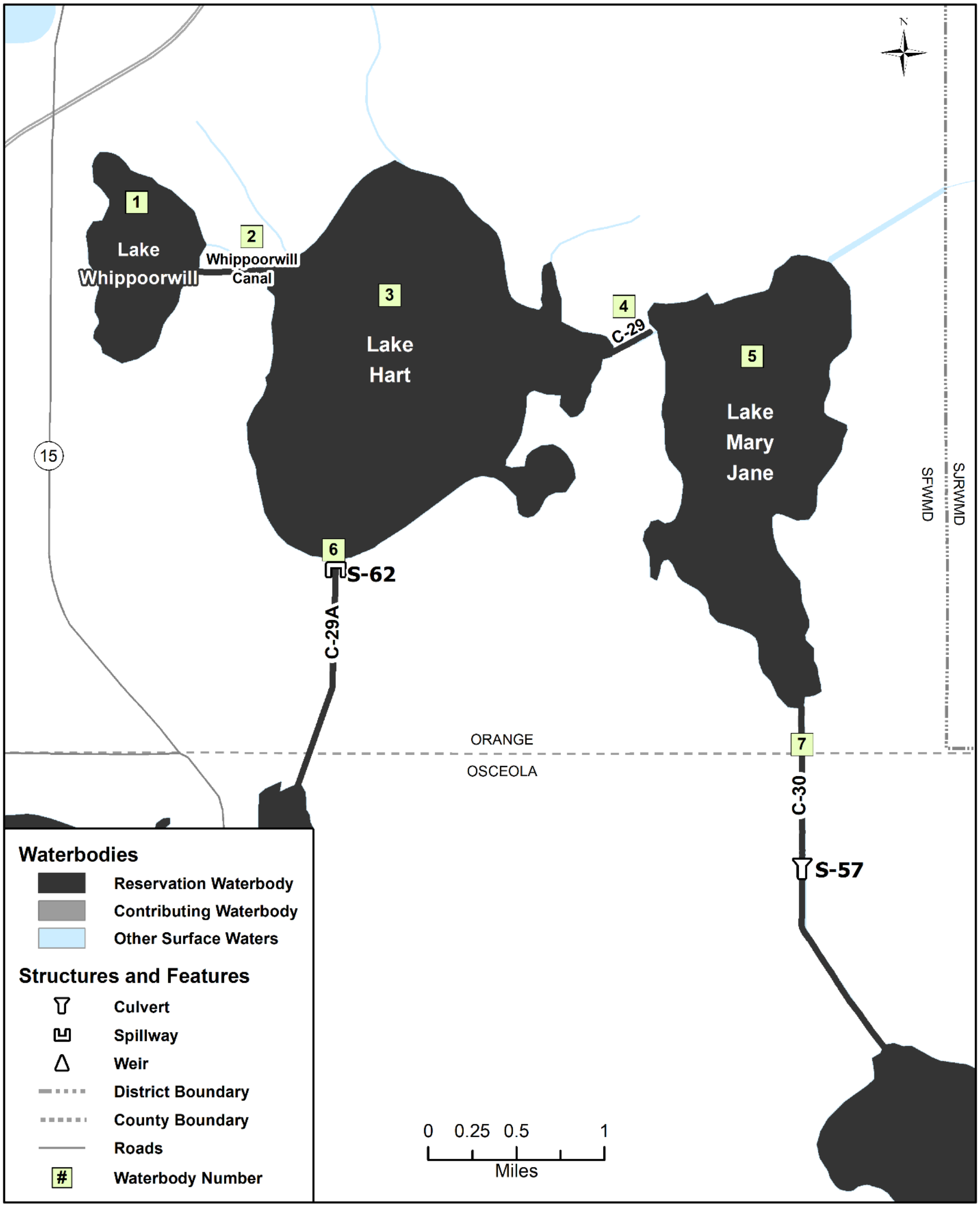


Figure A-2. Lakes Hart-Mary Jane reservation waterbodies (no contributing waterbodies present). Unlabeled waterbodies in this figure are not included in this reservation waterbody group.

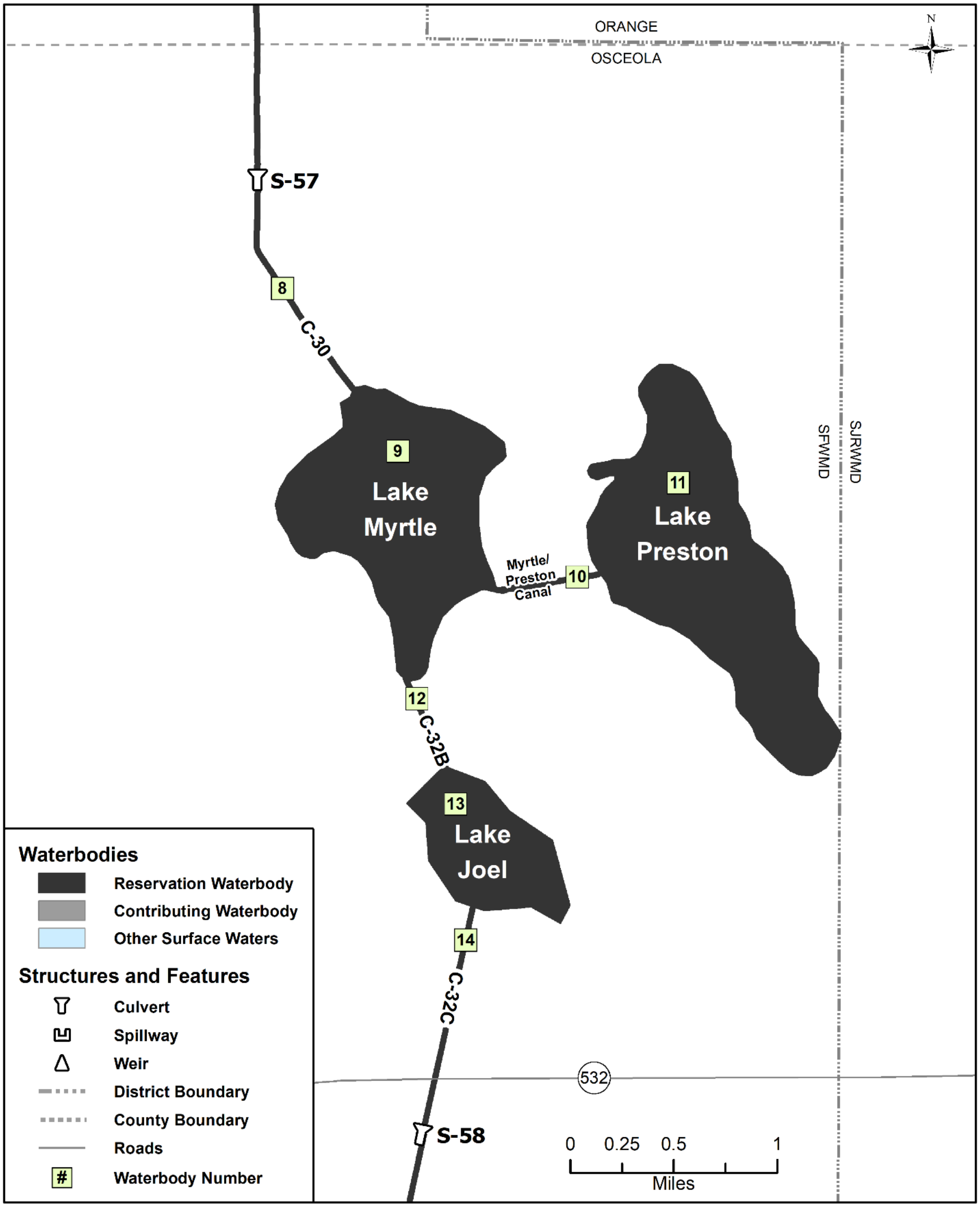


Figure A-3. Lakes Myrtle-Preston-Joel reservation waterbodies (no contributing waterbodies present). Unlabeled waterbodies in this figure are not included in this reservation waterbody group.

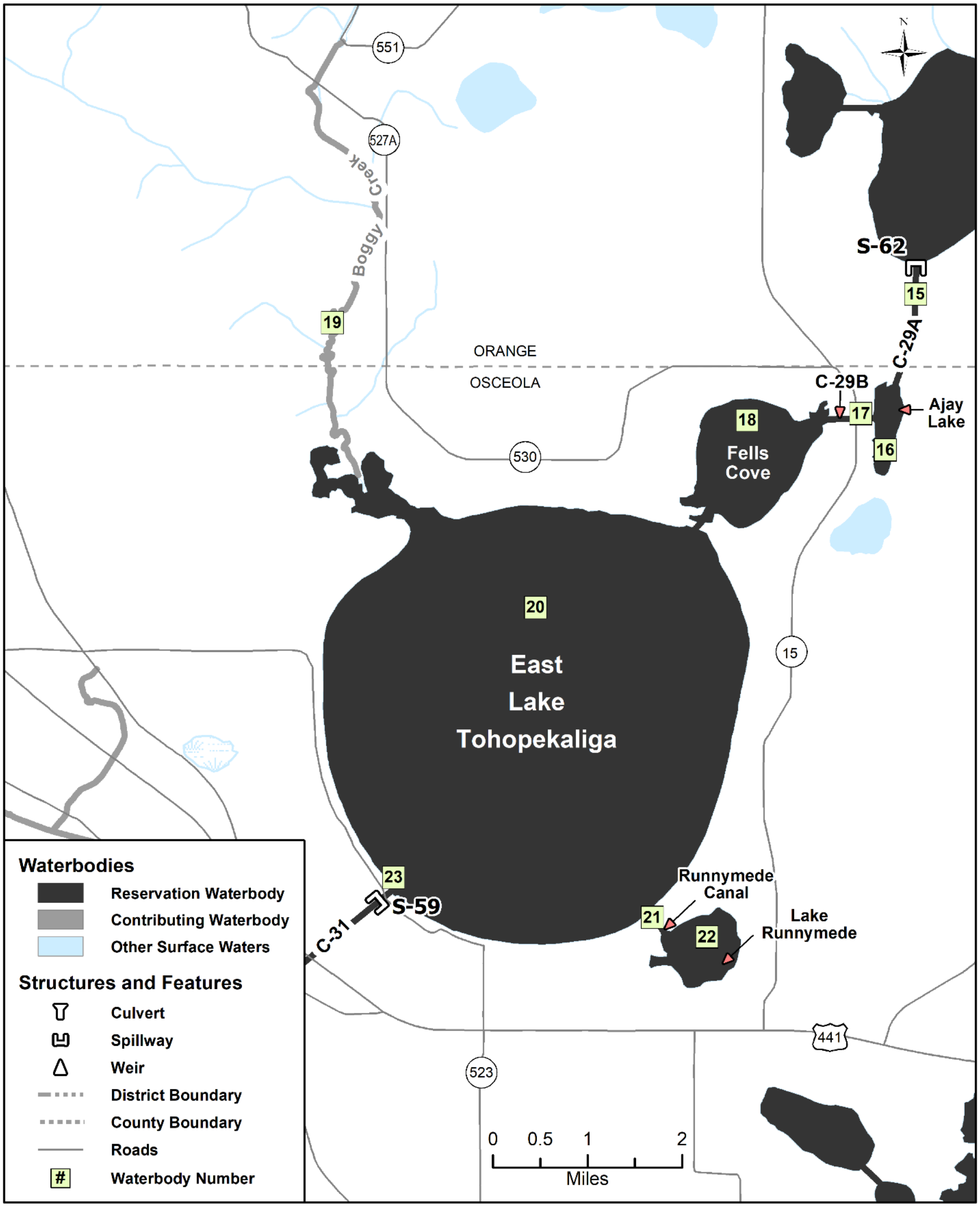
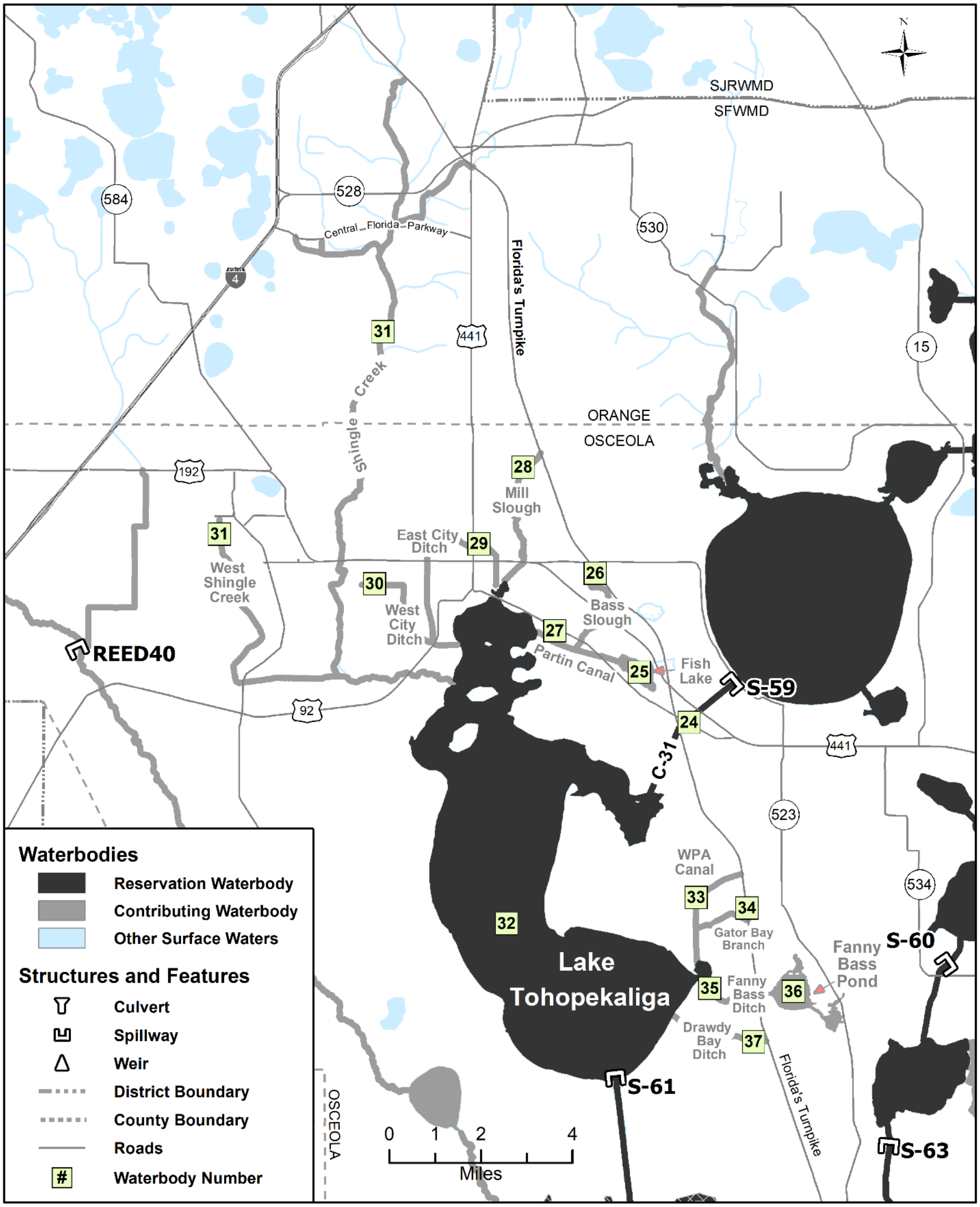


Figure A-4. East Lake Tohopekaliga reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.


N
SJRWMD
SFWMD
584
528
Central Florida Parkway
4
530
Florida's Turnpike
441
31
Shingle Creek
15
ORANGE
OSCEOLA
192
28
Mill Slough
31
West Shingle Creek
East City Ditch
29
30
West City Ditch
26
Bass Slough
27
Partin Canal
25
Fish Lake
REED40
S-59
92
24
441
C-31
523
WPA Canal
33
34
534
32
Gator Bay Branch
Fanny Bass Pond
S-60
Lake Tohopekaliga
35
Fanny Bass Ditch
36
Drawdy Bay Ditch
37
S-61
OSCEOLA
0 1 2 4
Miles
Florida's Turnpike
S-63
Waterbodies
Reservation Waterbody
Contributing Waterbody
Other Surface Waters
Structures and Features
Culvert
Spillway
Weir
District Boundary
County Boundary
Roads
#
Waterbody Number

2517
2518

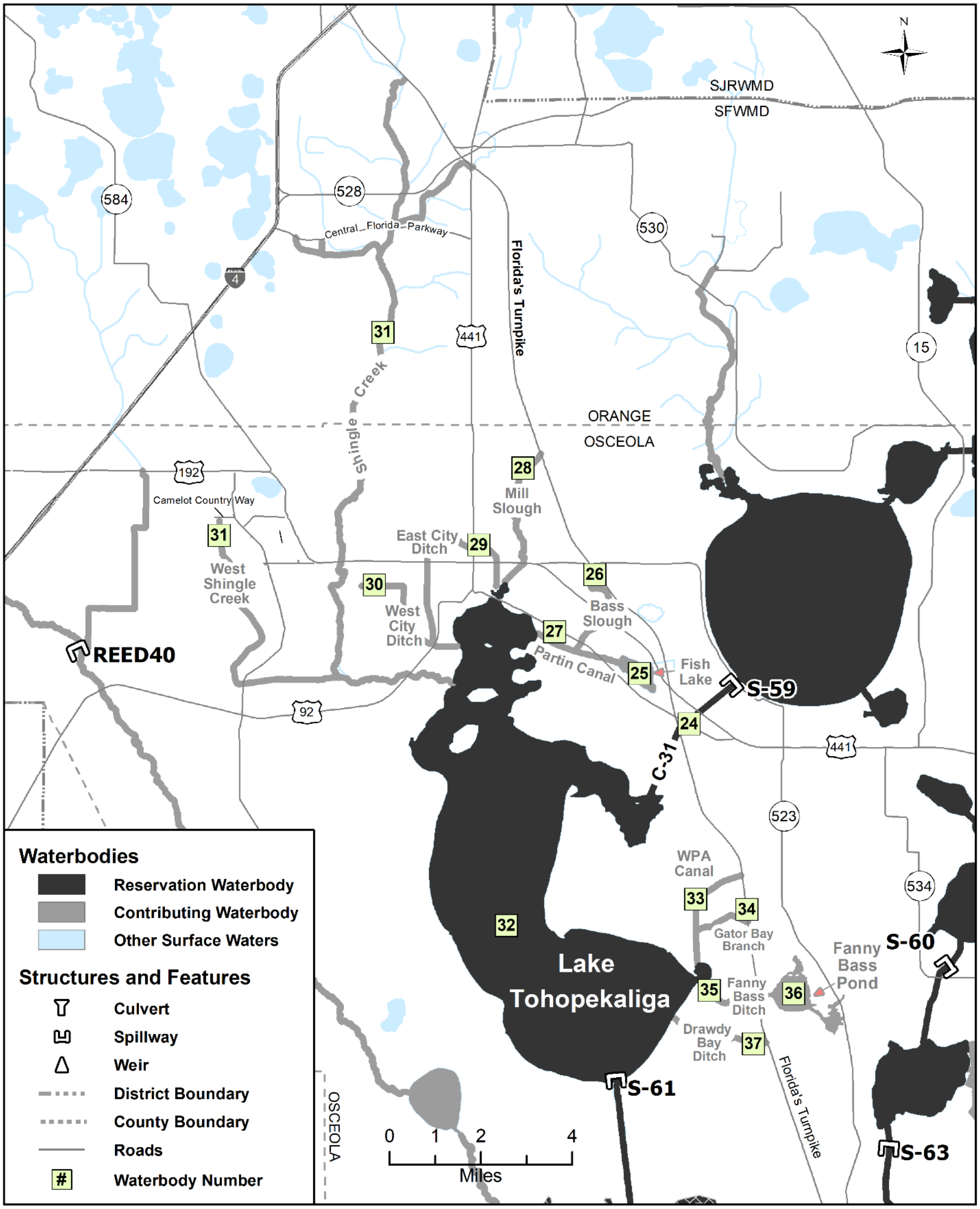


Figure A-5. Lake Tohopekaliga reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

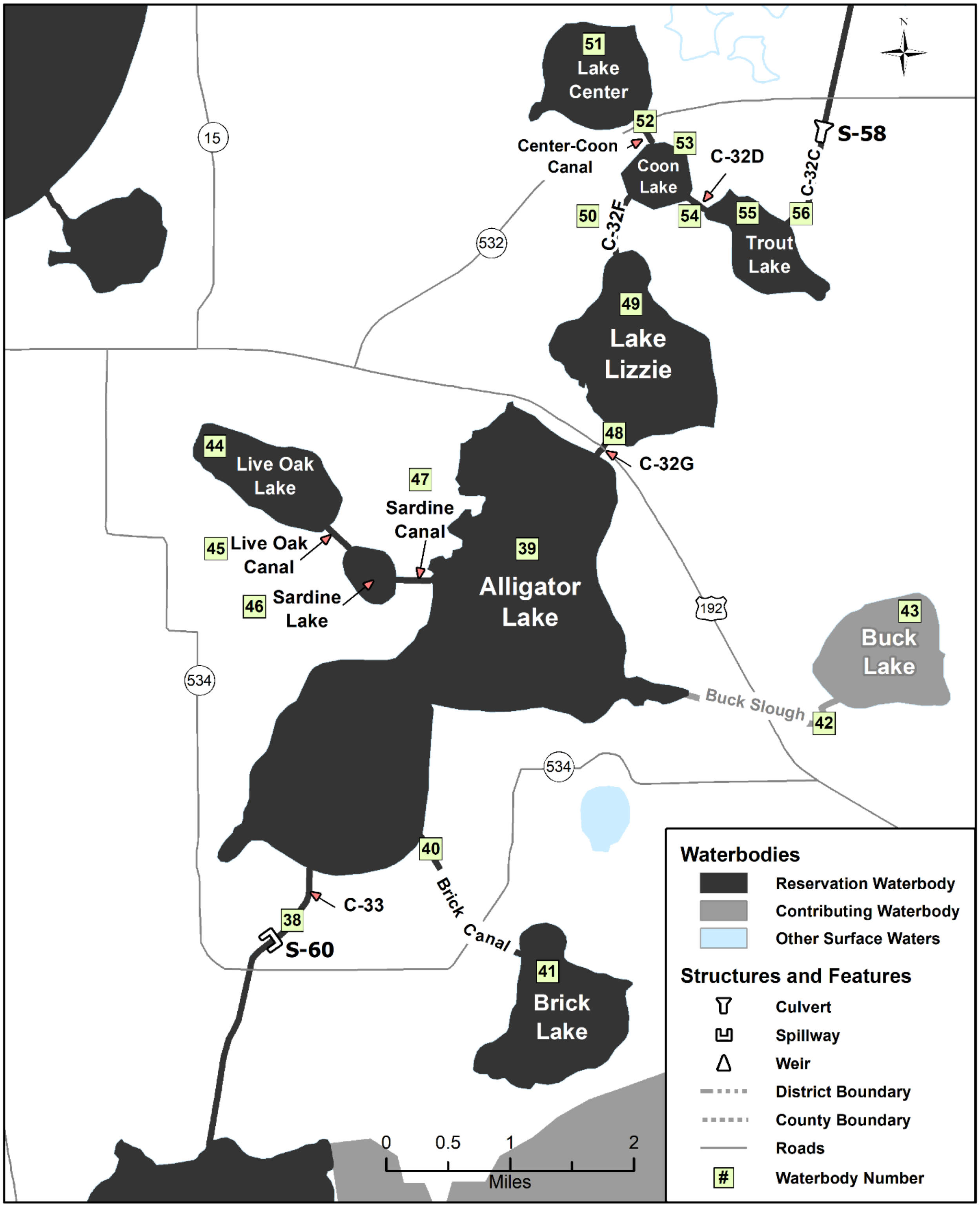
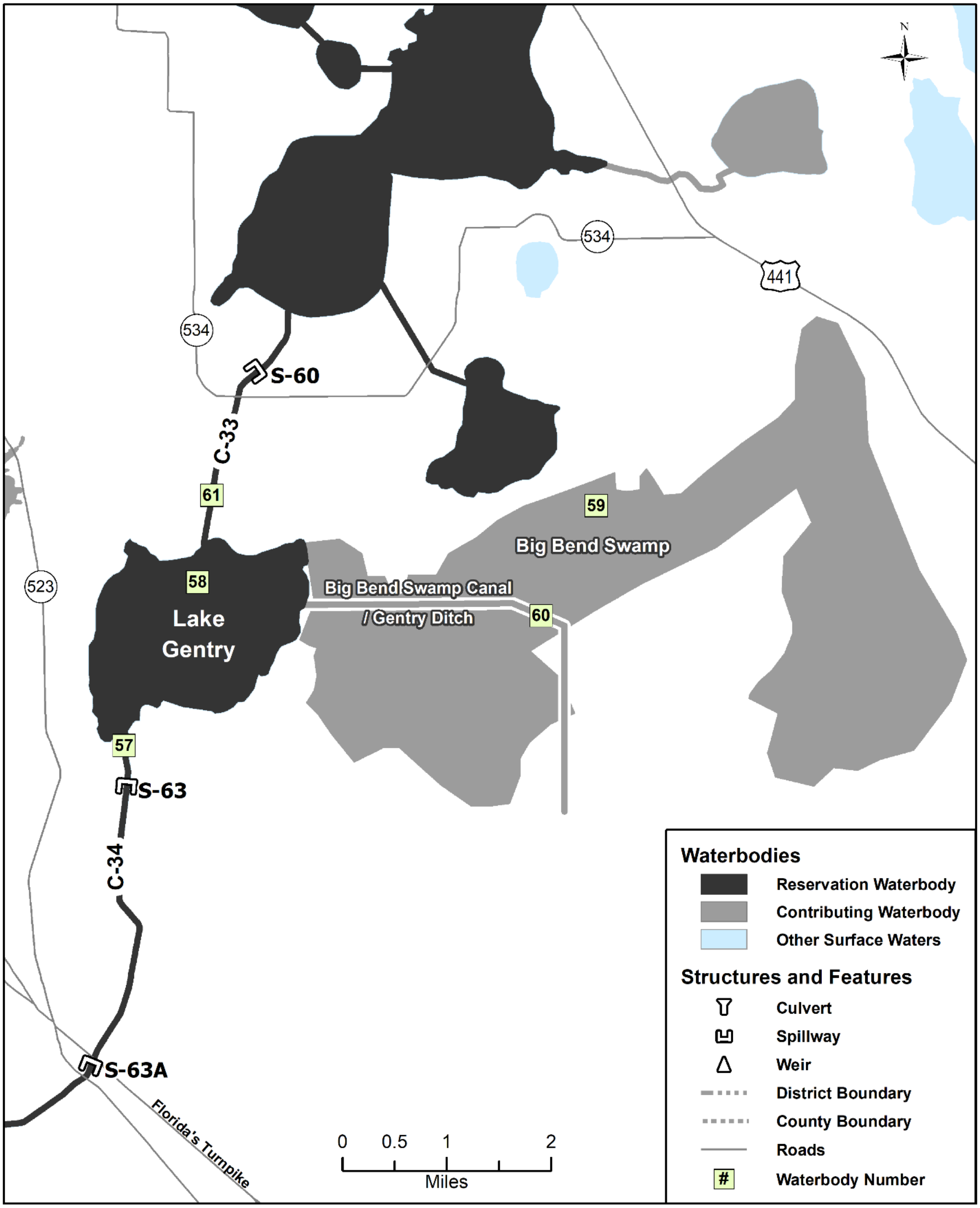


Figure A-6. Alligator Chain of Lakes reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.


N
534
534
441
S-60
C-33
61
59
Big Bend Swamp
58
523
Big Bend Swamp Canal
/ Gentry Ditch
60
Lake
Gentry
57
S-63
C-34
S-63A
Florida's Turnpike
0
0.5
1
2
Miles
Waterbodies
Reservation Waterbody
Contributing Waterbody
Other Surface Waters
Structures and Features
Culvert
Spillway
Weir
District Boundary
County Boundary
Roads
#
Waterbody Number

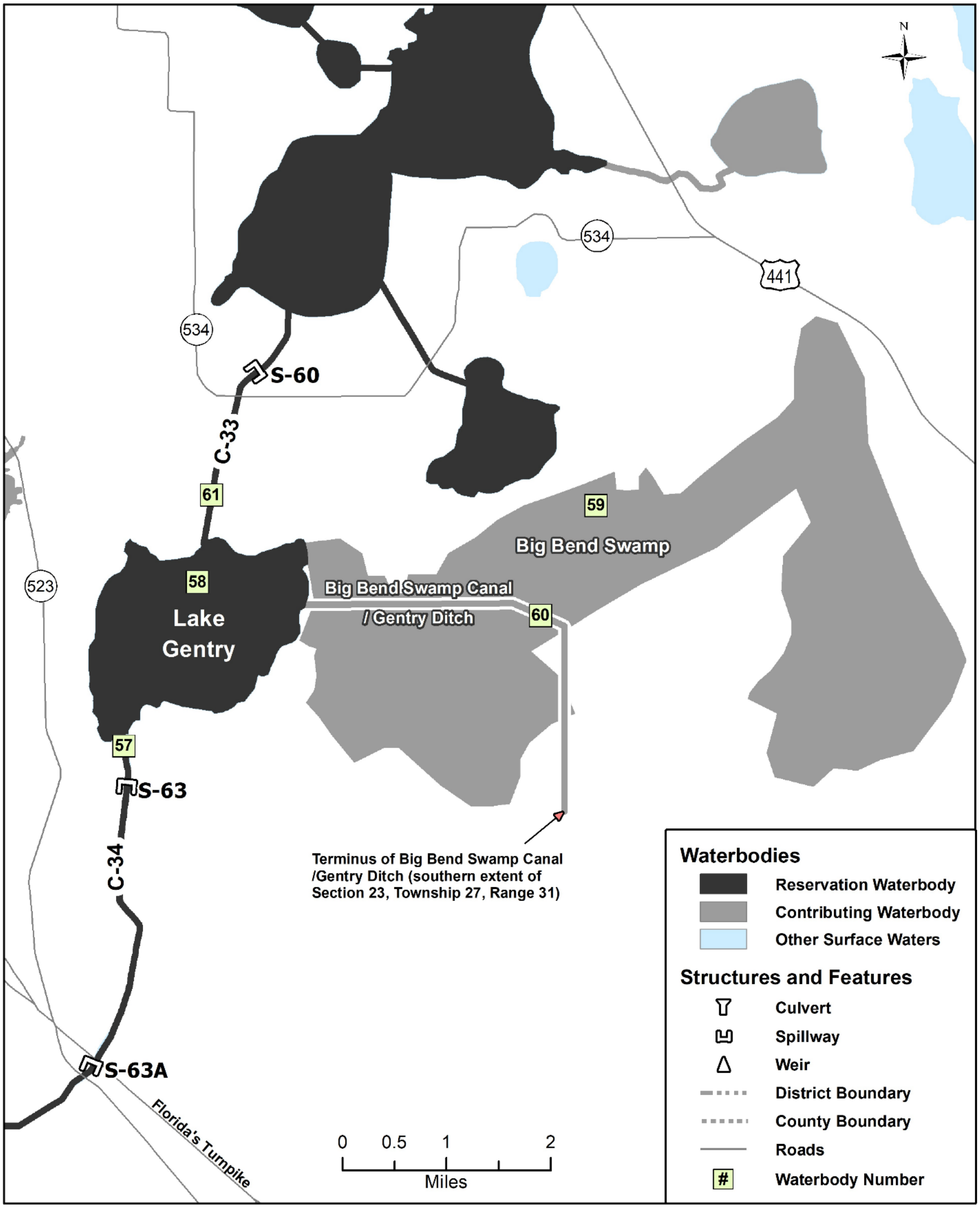


Figure A-7. Lake Gentry reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

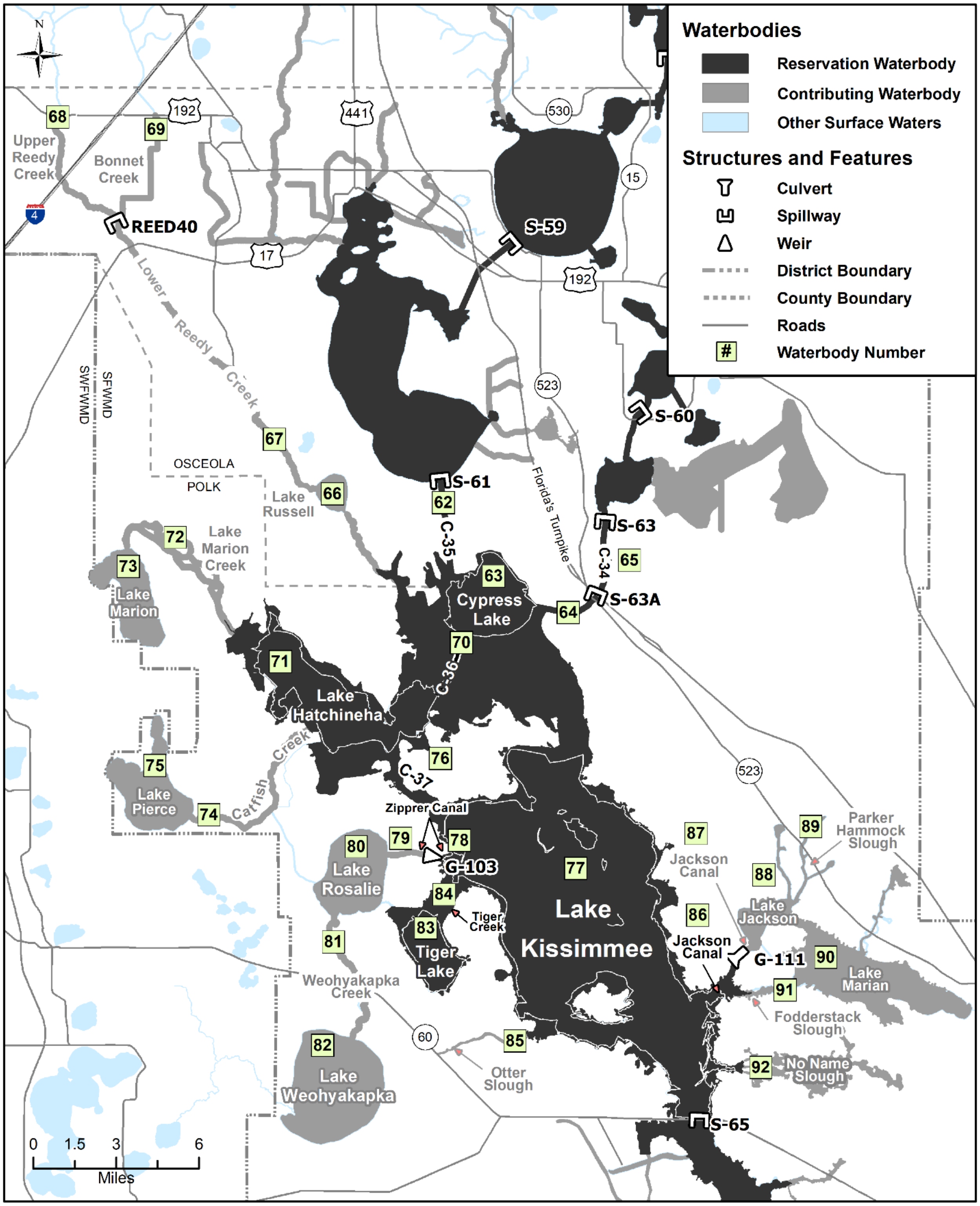


Figure A-8. Headwaters Revitalization Lakes reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

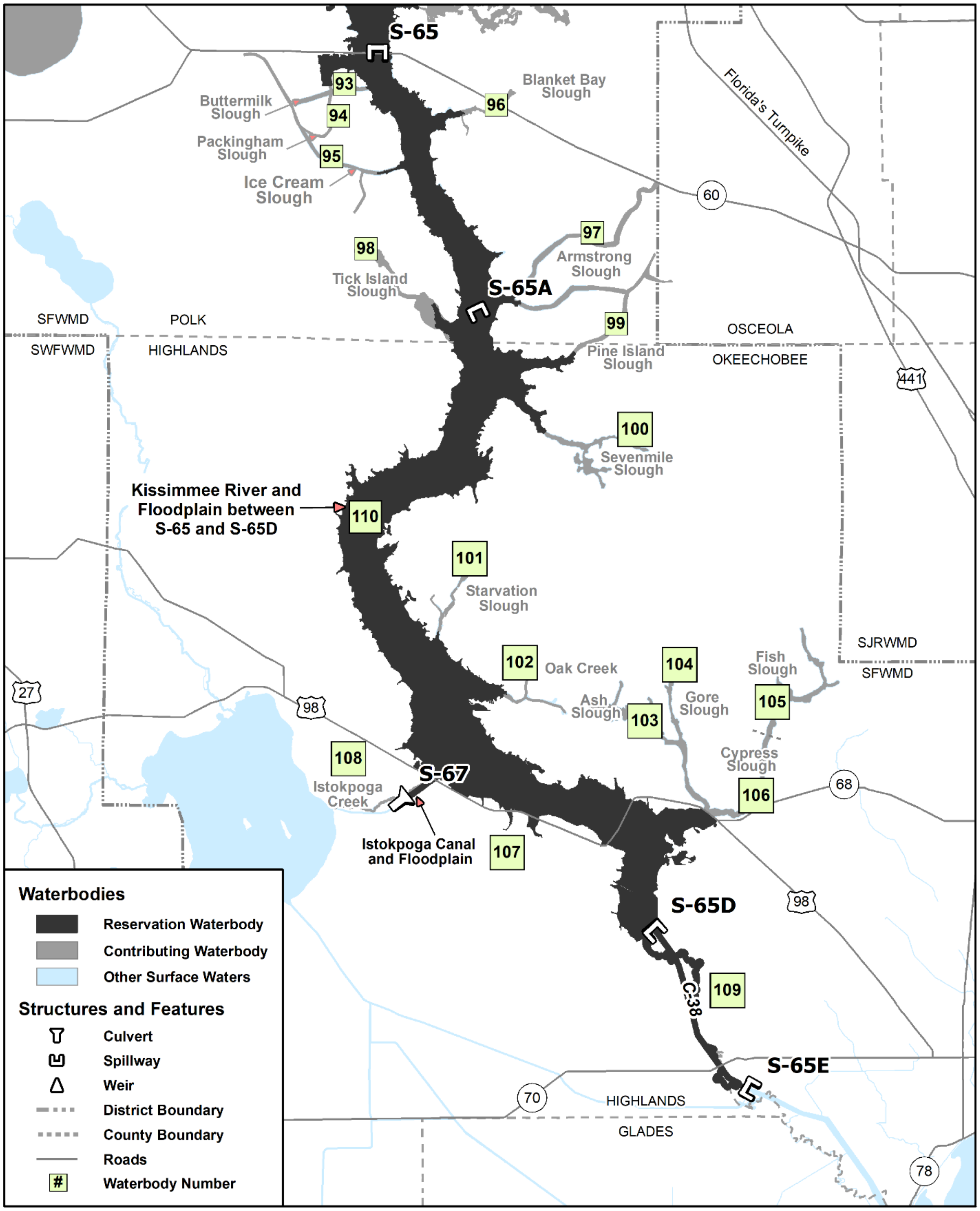


Figure A-9. Kissimmee River reservation and contributing waterbodies. Unlabeled waterbodies in this figure are not included in this reservation/contributing waterbody group.

LITERATURE CITED

SFWMD. 2015. *Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District*. South Florida Water Management District, West Palm Beach, FL. September 7, 2015.

APPENDIX B: WATER PROPOSED FOR RESERVATION

All unallocated water in the Kissimmee River and in the Headwaters Revitalization Lakes up to the stages in the Headwaters Revitalization Schedule (HRS) at the S-65 water control structure will be reserved for the protection of fish and wildlife and to ensure the successful completion and implementation of the Kissimmee River Restoration Project (KRRP). For Upper Chain of Lakes (UCOL) reservation waterbodies, only water up to specific identified stages are proposed for reservation. These stages preserve the seasonal and interannual water level variability needed to support fish and wildlife in the UCOL reservation waterbodies. When daily lake stages are plotted over the course of a year (water reservation hydrograph), a water reservation line (WRL) emerges that demarcates the boundary between water needed (at or below the line) and water not needed (above the line) for the protection of fish and wildlife. **Figures B-1** to **B-7** provide the water reservation hydrographs with WRLs and current authorized regulation schedules for the reservation waterbodies. **Tables B-1** to **B-7** provide the daily water reservation stages plotted on the hydrographs for each reservation waterbody. The Water Reservation rules will reserve from allocation all water at or below the WRLs that is not allocated to existing legal users (permittees). Water above the WRLs will be available for future allocation, provided other regulatory permitting criteria are met.

The process to develop the WRLs for each UCOL reservation waterbody involved: 1) specifying a seasonal high stage and duration; 2) specifying a seasonal low stage; 3) connecting the seasonal high to the seasonal low stage with a straight-line recession event; 4) adjusting the resulting WRL to protect breeding season and wet season hydrological patterns (recession and ascension rates or breeding season water levels) that historically occurred; and 5) adjusting the resulting WRL to meet specific hydrologic requirements of fish and wildlife in the lake.

The seasonal high stage specified for the reservation waterbody defines an upper stage limit or threshold that preserves the maximum littoral extent in the waterbody, ensuring no reduction in wetland extent will occur below that elevation. For all UCOL reservation waterbodies, the seasonal high stage was specified 1) as the same high stage limit of the current stage regulation schedule, and 2) to occur on the first day the regulation schedule allows that stage to be reached (November 1).

Selection of the seasonal low stage establishes how much of the littoral zone can be dried out on an annual basis (i.e., it defines the boundary between permanently inundated aquatic vegetation and vegetation types that are seasonally inundated and require regular drying events). Under the current regulation schedules, lake stages are managed to reach the same low stage on May 31 every year, providing storage capacity for flood control at the beginning of the wet season. In order to protect the extent of permanently flooded marshes, the minimum stage for the UCOL reservation waterbodies was set as the minimum of the regulation schedule. This ensures the extent of annual drying events would not increase downslope from historical levels, which might lead to a reduction in overall open-water extent or an expansion of the littoral zone lakeward (downslope). A more detailed description of the approach used to establish the WRL for each UCOL reservation waterbody is provided in Chapter 5 of the main document.

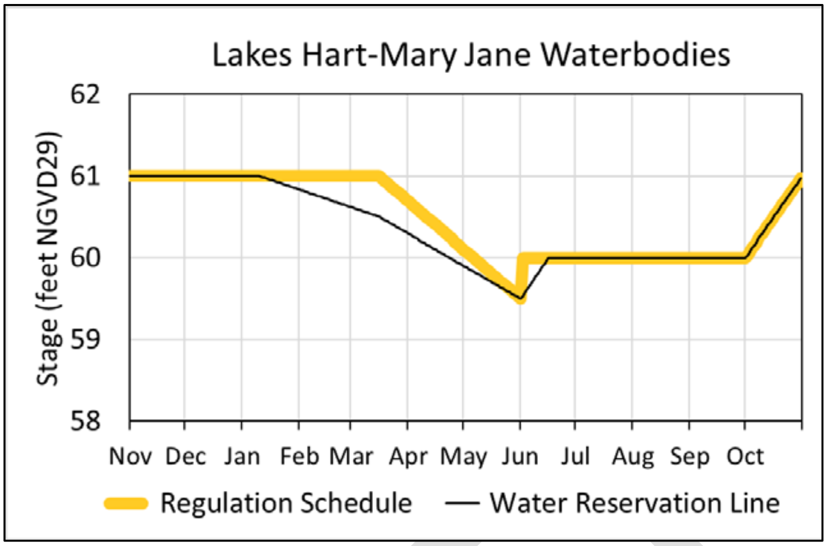


Figure B-1. Hydrograph of the current regulation schedule and the water reservation stage at S-62 (water reservation line) for Lakes Hart-Mary Jane reservation waterbodies. All water up to the water reservation line is reserved from allocation for protection of fish and wildlife (derived from data in **Table B-1**).

Table B-1. Maximum daily water reservation stages at S-62 for Lakes Hart-Mary Jane reservation waterbodies (black line in **Figure B-1**).

Day	January	February	March	April	May	June	July	August	September	October	November	December
1	61.00	60.83	60.62	60.29	59.90	59.50	60.00	60.00	60.00	60.00	61.00	61.00
2	61.00	60.82	60.61	60.28	59.89	59.53	60.00	60.00	60.00	60.03	61.00	61.00
3	61.00	60.82	60.60	60.27	59.88	59.57	60.00	60.00	60.00	60.06	61.00	61.00
4	61.00	60.81	60.59	60.25	59.86	59.60	60.00	60.00	60.00	60.10	61.00	61.00
5	61.00	60.80	60.58	60.24	59.85	59.63	60.00	60.00	60.00	60.13	61.00	61.00
6	61.00	60.79	60.58	60.23	59.84	59.67	60.00	60.00	60.00	60.16	61.00	61.00
7	61.00	60.78	60.57	60.21	59.82	59.70	60.00	60.00	60.00	60.19	61.00	61.00
8	61.00	60.78	60.56	60.20	59.81	59.73	60.00	60.00	60.00	60.23	61.00	61.00
9	61.00	60.77	60.55	60.19	59.80	59.77	60.00	60.00	60.00	60.26	61.00	61.00
10	61.00	60.76	60.55	60.18	59.79	59.80	60.00	60.00	60.00	60.29	61.00	61.00
11	60.99	60.75	60.54	60.16	59.77	59.83	60.00	60.00	60.00	60.32	61.00	61.00
12	60.98	60.75	60.53	60.15	59.76	59.87	60.00	60.00	60.00	60.35	61.00	61.00
13	60.98	60.74	60.52	60.14	59.75	59.90	60.00	60.00	60.00	60.39	61.00	61.00
14	60.97	60.73	60.52	60.12	59.73	59.93	60.00	60.00	60.00	60.42	61.00	61.00
15	60.96	60.72	60.51	60.11	59.72	59.97	60.00	60.00	60.00	60.45	61.00	61.00
16	60.95	60.72	60.50	60.10	59.71	60.00	60.00	60.00	60.00	60.48	61.00	61.00
17	60.95	60.71	60.49	60.08	59.69	60.00	60.00	60.00	60.00	60.52	61.00	61.00
18	60.94	60.70	60.47	60.07	59.68	60.00	60.00	60.00	60.00	60.55	61.00	61.00
19	60.93	60.69	60.46	60.06	59.67	60.00	60.00	60.00	60.00	60.58	61.00	61.00
20	60.92	60.68	60.45	60.05	59.66	60.00	60.00	60.00	60.00	60.61	61.00	61.00
21	60.92	60.68	60.44	60.03	59.64	60.00	60.00	60.00	60.00	60.65	61.00	61.00
22	60.91	60.67	60.42	60.02	59.63	60.00	60.00	60.00	60.00	60.68	61.00	61.00
23	60.90	60.66	60.41	60.01	59.62	60.00	60.00	60.00	60.00	60.71	61.00	61.00
24	60.89	60.65	60.40	59.99	59.60	60.00	60.00	60.00	60.00	60.74	61.00	61.00
25	60.88	60.65	60.38	59.98	59.59	60.00	60.00	60.00	60.00	60.77	61.00	61.00
26	60.88	60.64	60.37	59.97	59.58	60.00	60.00	60.00	60.00	60.81	61.00	61.00
27	60.87	60.63	60.36	59.95	59.56	60.00	60.00	60.00	60.00	60.84	61.00	61.00
28	60.86	60.62	60.34	59.94	59.55	60.00	60.00	60.00	60.00	60.87	61.00	61.00
29	60.85		60.33	59.93	59.54	60.00	60.00	60.00	60.00	60.90	61.00	61.00
30	60.85		60.32	59.92	59.53	60.00	60.00	60.00	60.00	60.94	61.00	61.00
31	60.84		60.31		59.51		60.00	60.00		60.97		61.00

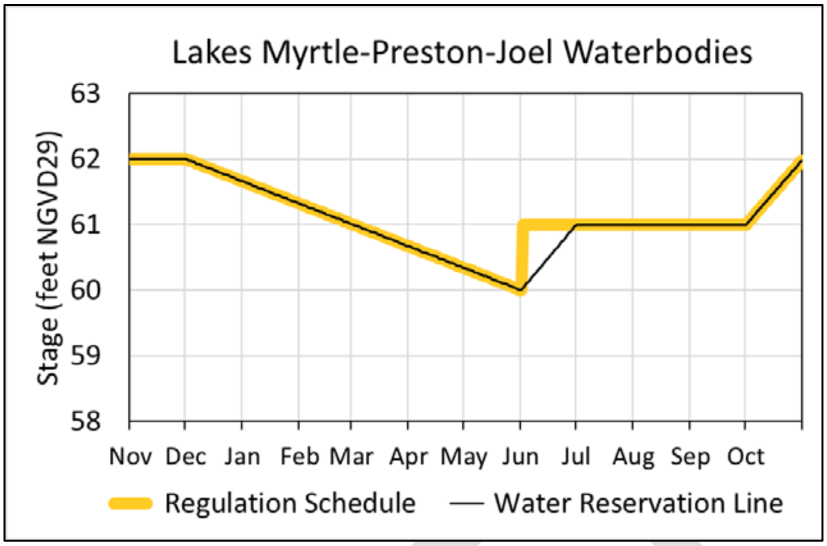


Figure B-2. Hydrograph of the current regulation schedule and the water reservation stage at S-57 (water reservation line) for Lakes Myrtle-Preston-Joel reservation waterbodies. All water up to the water reservation line is reserved from allocation for protection of fish and wildlife (derived from data in **Table B-2**).

Table B-2. Maximum daily water reservation stages at S-57 for Lakes Myrtle-Preston-Joel reservation waterbodies (black line in **Figure B-2**).

Day	January	February	March	April	May	June	July	August	September	October	November	December
1	61.66	61.32	61.01	60.67	60.34	60.00	61.00	61.00	61.00	61.00	62.00	62.00
2	61.65	61.31	61.00	60.66	60.33	60.03	61.00	61.00	61.00	61.03	62.00	61.99
3	61.64	61.30	60.99	60.65	60.32	60.07	61.00	61.00	61.00	61.06	62.00	61.98
4	61.63	61.29	60.98	60.64	60.31	60.10	61.00	61.00	61.00	61.10	62.00	61.97
5	61.62	61.27	60.97	60.63	60.30	60.13	61.00	61.00	61.00	61.13	62.00	61.96
6	61.60	61.26	60.96	60.62	60.29	60.17	61.00	61.00	61.00	61.16	62.00	61.95
7	61.59	61.25	60.94	60.60	60.27	60.20	61.00	61.00	61.00	61.19	62.00	61.93
8	61.58	61.24	60.93	60.59	60.26	60.23	61.00	61.00	61.00	61.23	62.00	61.92
9	61.57	61.23	60.92	60.58	60.25	60.27	61.00	61.00	61.00	61.26	62.00	61.91
10	61.56	61.22	60.91	60.57	60.24	60.30	61.00	61.00	61.00	61.29	62.00	61.90
11	61.55	61.21	60.90	60.56	60.23	60.33	61.00	61.00	61.00	61.32	62.00	61.89
12	61.54	61.20	60.89	60.55	60.22	60.37	61.00	61.00	61.00	61.35	62.00	61.88
13	61.53	61.19	60.88	60.54	60.21	60.40	61.00	61.00	61.00	61.39	62.00	61.87
14	61.52	61.18	60.87	60.53	60.20	60.43	61.00	61.00	61.00	61.42	62.00	61.86
15	61.51	61.16	60.86	60.52	60.19	60.47	61.00	61.00	61.00	61.45	62.00	61.85
16	61.49	61.15	60.85	60.51	60.18	60.50	61.00	61.00	61.00	61.48	62.00	61.84
17	61.48	61.14	60.84	60.49	60.16	60.53	61.00	61.00	61.00	61.52	62.00	61.83
18	61.47	61.13	60.82	60.48	60.15	60.57	61.00	61.00	61.00	61.55	62.00	61.81
19	61.46	61.12	60.81	60.47	60.14	60.60	61.00	61.00	61.00	61.58	62.00	61.80
20	61.45	61.11	60.80	60.46	60.13	60.63	61.00	61.00	61.00	61.61	62.00	61.79
21	61.44	61.10	60.79	60.45	60.12	60.67	61.00	61.00	61.00	61.65	62.00	61.78
22	61.43	61.09	60.78	60.44	60.11	60.70	61.00	61.00	61.00	61.68	62.00	61.77
23	61.42	61.08	60.77	60.43	60.10	60.73	61.00	61.00	61.00	61.71	62.00	61.76
24	61.41	61.07	60.76	60.42	60.09	60.77	61.00	61.00	61.00	61.74	62.00	61.75
25	61.40	61.05	60.75	60.41	60.08	60.80	61.00	61.00	61.00	61.77	62.00	61.74
26	61.38	61.04	60.74	60.40	60.07	60.83	61.00	61.00	61.00	61.81	62.00	61.73
27	61.37	61.03	60.73	60.38	60.05	60.87	61.00	61.00	61.00	61.84	62.00	61.72
28	61.36	61.02	60.71	60.37	60.04	60.90	61.00	61.00	61.00	61.87	62.00	61.70
29	61.35		60.70	60.36	60.03	60.93	61.00	61.00	61.00	61.90	62.00	61.69
30	61.34		60.69	60.35	60.02	60.97	61.00	61.00	61.00	61.94	62.00	61.68
31	61.33		60.68		60.01		61.00	61.00		61.97		61.67

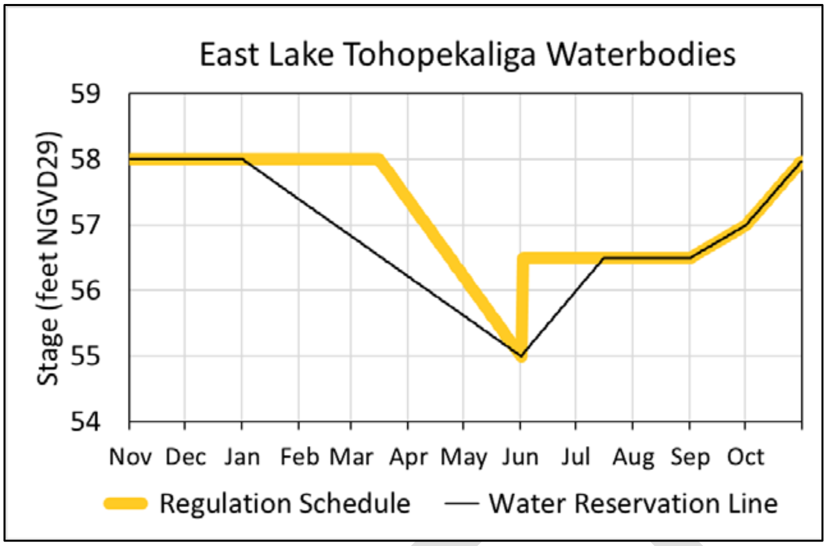


Figure B-3. Hydrograph of the current regulation schedule and the water reservation stage at S-59 (water reservation line) for East Lake Tohopekaliga reservation waterbodies. All water up to the water reservation line is reserved from allocation for protection of fish and wildlife (derived from data in **Table B-3**).

Table B-3. Maximum daily water reservation stages at S-59 for East Lake Tohopekaliga reservation waterbodies (black line in **Figure B-3**).

Day	January	February	March	April	May	June	July	August	September	October	November	December
1	58.00	57.38	56.83	56.21	55.62	55.00	56.00	56.50	56.50	57.00	58.00	58.00
2	57.98	57.36	56.81	56.19	55.60	55.03	56.03	56.50	56.52	57.03	58.00	58.00
3	57.96	57.34	56.79	56.17	55.58	55.07	56.07	56.50	56.53	57.06	58.00	58.00
4	57.94	57.32	56.77	56.15	55.56	55.10	56.10	56.50	56.55	57.10	58.00	58.00
5	57.92	57.30	56.75	56.13	55.54	55.13	56.13	56.50	56.57	57.13	58.00	58.00
6	57.90	57.28	56.73	56.11	55.52	55.17	56.17	56.50	56.58	57.16	58.00	58.00
7	57.88	57.26	56.71	56.09	55.50	55.20	56.20	56.50	56.60	57.19	58.00	58.00
8	57.86	57.25	56.69	56.07	55.48	55.23	56.23	56.50	56.62	57.23	58.00	58.00
9	57.84	57.23	56.67	56.05	55.46	55.27	56.27	56.50	56.63	57.26	58.00	58.00
10	57.82	57.21	56.65	56.03	55.44	55.30	56.30	56.50	56.65	57.29	58.00	58.00
11	57.80	57.19	56.63	56.01	55.42	55.33	56.33	56.50	56.67	57.32	58.00	58.00
12	57.78	57.17	56.61	55.99	55.40	55.37	56.37	56.50	56.68	57.35	58.00	58.00
13	57.76	57.15	56.59	55.97	55.38	55.40	56.40	56.50	56.70	57.39	58.00	58.00
14	57.74	57.13	56.57	55.95	55.36	55.43	56.43	56.50	56.72	57.42	58.00	58.00
15	57.72	57.11	56.55	55.93	55.34	55.47	56.47	56.50	56.73	57.45	58.00	58.00
16	57.70	57.09	56.53	55.91	55.32	55.50	56.50	56.50	56.75	57.48	58.00	58.00
17	57.68	57.07	56.51	55.89	55.30	55.53	56.50	56.50	56.77	57.52	58.00	58.00
18	57.66	57.05	56.49	55.87	55.28	55.57	56.50	56.50	56.78	57.55	58.00	58.00
19	57.64	57.03	56.47	55.85	55.26	55.60	56.50	56.50	56.80	57.58	58.00	58.00
20	57.62	57.01	56.45	55.83	55.24	55.63	56.50	56.50	56.82	57.61	58.00	58.00
21	57.60	56.99	56.43	55.81	55.22	55.67	56.50	56.50	56.83	57.65	58.00	58.00
22	57.58	56.97	56.41	55.79	55.20	55.70	56.50	56.50	56.85	57.68	58.00	58.00
23	57.56	56.95	56.39	55.77	55.18	55.73	56.50	56.50	56.87	57.71	58.00	58.00
24	57.54	56.93	56.37	55.75	55.16	55.77	56.50	56.50	56.88	57.74	58.00	58.00
25	57.52	56.91	56.35	55.74	55.14	55.80	56.50	56.50	56.90	57.77	58.00	58.00
26	57.50	56.89	56.33	55.72	55.12	55.83	56.50	56.50	56.92	57.81	58.00	58.00
27	57.48	56.87	56.31	55.70	55.10	55.87	56.50	56.50	56.93	57.84	58.00	58.00
28	57.46	56.85	56.29	55.68	55.08	55.90	56.50	56.50	56.95	57.87	58.00	58.00
29	57.44		56.27	55.66	55.06	55.93	56.50	56.50	56.97	57.90	58.00	58.00
30	57.42		56.25	55.64	55.04	55.97	56.50	56.50	56.98	57.94	58.00	58.00
31	57.40		56.23		55.02		56.50	56.50		57.97		58.00

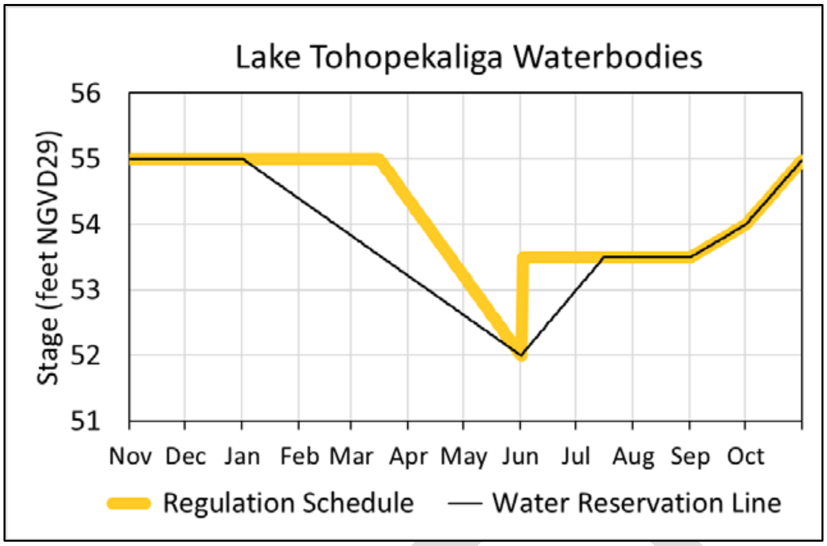


Figure B-4. Hydrograph of the current regulation schedule and the water reservation stage at S-61 (water reservation line) for Lake Tohopekaliga reservation waterbodies. All water up to the water reservation line is reserved from allocation for protection of fish and wildlife (derived from data in **Table B-4**).

Table B-4. Maximum daily water reservation stages at S-61 for Lake Tohopekaliga reservation waterbodies (black line in **Figure B-4**).

Day	January	February	March	April	May	June	July	August	September	October	November	December
1	55.00	54.38	53.83	53.21	52.62	52.00	53.00	53.50	53.50	54.00	55.00	55.00
2	54.98	54.36	53.81	53.19	52.60	52.03	53.03	53.50	53.52	54.03	55.00	55.00
3	54.96	54.34	53.79	53.17	52.58	52.07	53.07	53.50	53.53	54.06	55.00	55.00
4	54.94	54.32	53.77	53.15	52.56	52.10	53.10	53.50	53.55	54.10	55.00	55.00
5	54.92	54.30	53.75	53.13	52.54	52.13	53.13	53.50	53.57	54.13	55.00	55.00
6	54.90	54.28	53.73	53.11	52.52	52.17	53.17	53.50	53.58	54.16	55.00	55.00
7	54.88	54.26	53.71	53.09	52.50	52.20	53.20	53.50	53.60	54.19	55.00	55.00
8	54.86	54.25	53.69	53.07	52.48	52.23	53.23	53.50	53.62	54.23	55.00	55.00
9	54.84	54.23	53.67	53.05	52.46	52.27	53.27	53.50	53.63	54.26	55.00	55.00
10	54.82	54.21	53.65	53.03	52.44	52.30	53.30	53.50	53.65	54.29	55.00	55.00
11	54.80	54.19	53.63	53.01	52.42	52.33	53.33	53.50	53.67	54.32	55.00	55.00
12	54.78	54.17	53.61	52.99	52.40	52.37	53.37	53.50	53.68	54.35	55.00	55.00
13	54.76	54.15	53.59	52.97	52.38	52.40	53.40	53.50	53.70	54.39	55.00	55.00
14	54.74	54.13	53.57	52.95	52.36	52.43	53.43	53.50	53.72	54.42	55.00	55.00
15	54.72	54.11	53.55	52.93	52.34	52.47	53.47	53.50	53.73	54.45	55.00	55.00
16	54.70	54.09	53.53	52.91	52.32	52.50	53.50	53.50	53.75	54.48	55.00	55.00
17	54.68	54.07	53.51	52.89	52.30	52.53	53.50	53.50	53.77	54.52	55.00	55.00
18	54.66	54.05	53.49	52.87	52.28	52.57	53.50	53.50	53.78	54.55	55.00	55.00
19	54.64	54.03	53.47	52.85	52.26	52.60	53.50	53.50	53.80	54.58	55.00	55.00
20	54.62	54.01	53.45	52.83	52.24	52.63	53.50	53.50	53.82	54.61	55.00	55.00
21	54.60	53.99	53.43	52.81	52.22	52.67	53.50	53.50	53.83	54.65	55.00	55.00
22	54.58	53.97	53.41	52.79	52.20	52.70	53.50	53.50	53.85	54.68	55.00	55.00
23	54.56	53.95	53.39	52.77	52.18	52.73	53.50	53.50	53.87	54.71	55.00	55.00
24	54.54	53.93	53.37	52.75	52.16	52.77	53.50	53.50	53.88	54.74	55.00	55.00
25	54.52	53.91	53.35	52.74	52.14	52.80	53.50	53.50	53.90	54.77	55.00	55.00
26	54.50	53.89	53.33	52.72	52.12	52.83	53.50	53.50	53.92	54.81	55.00	55.00
27	54.48	53.87	53.31	52.70	52.10	52.87	53.50	53.50	53.93	54.84	55.00	55.00
28	54.46	53.85	53.29	52.68	52.08	52.90	53.50	53.50	53.95	54.87	55.00	55.00
29	54.44		53.27	52.66	52.06	52.93	53.50	53.50	53.97	54.90	55.00	55.00
30	54.42		53.25	52.64	52.04	52.97	53.50	53.50	53.98	54.94	55.00	55.00
31	54.40		53.23		52.02		53.50	53.50		54.97		55.00

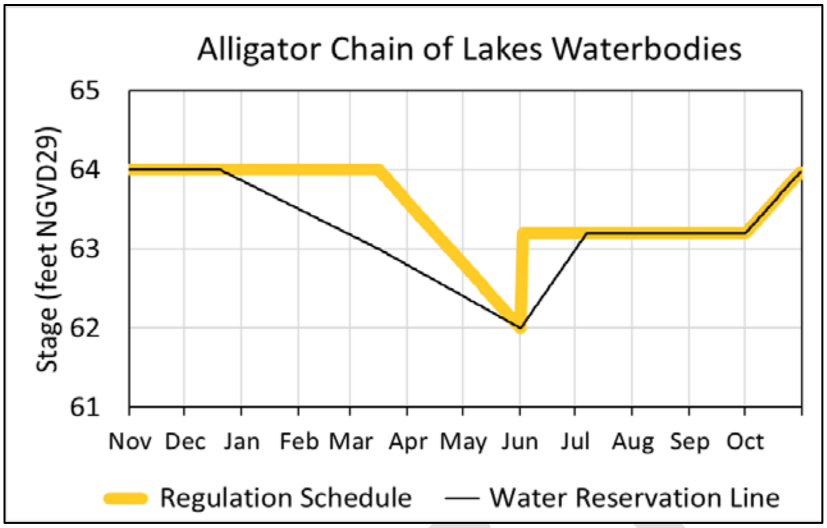


Figure B-5. Hydrograph of the current regulation schedule and the water reservation stage at S-60 (water reservation line) for Alligator Chain of Lakes reservation waterbodies. All water up to the water reservation line is reserved from allocation for protection of fish and wildlife (derived from data in **Table B-5**).

Table B-5. Maximum daily water reservation stages at S-60 for Alligator Chain of Lakes reservation waterbodies (black line in **Figure B-5**).

Day	January	February	March	April	May	June	July	August	September	October	November	December
1	63.86	63.50	63.17	62.79	62.40	62.00	63.00	63.20	63.20	63.20	64.00	64.00
2	63.85	63.49	63.16	62.78	62.39	62.03	63.03	63.20	63.20	63.23	64.00	64.00
3	63.84	63.48	63.15	62.77	62.38	62.07	63.07	63.20	63.20	63.25	64.00	64.00
4	63.83	63.47	63.14	62.75	62.36	62.10	63.10	63.20	63.20	63.28	64.00	64.00
5	63.81	63.45	63.13	62.74	62.35	62.13	63.13	63.20	63.20	63.30	64.00	64.00
6	63.80	63.44	63.12	62.73	62.34	62.17	63.17	63.20	63.20	63.33	64.00	64.00
7	63.79	63.43	63.10	62.71	62.32	62.20	63.20	63.20	63.20	63.35	64.00	64.00
8	63.78	63.42	63.09	62.70	62.31	62.23	63.20	63.20	63.20	63.38	64.00	64.00
9	63.77	63.41	63.08	62.69	62.30	62.27	63.20	63.20	63.20	63.41	64.00	64.00
10	63.76	63.40	63.07	62.68	62.29	62.30	63.20	63.20	63.20	63.43	64.00	64.00
11	63.74	63.38	63.06	62.66	62.27	62.33	63.20	63.20	63.20	63.46	64.00	64.00
12	63.73	63.37	63.05	62.65	62.26	62.37	63.20	63.20	63.20	63.48	64.00	64.00
13	63.72	63.36	63.03	62.64	62.25	62.40	63.20	63.20	63.20	63.51	64.00	64.00
14	63.71	63.35	63.02	62.62	62.23	62.43	63.20	63.20	63.20	63.54	64.00	64.00
15	63.70	63.34	63.01	62.61	62.22	62.47	63.20	63.20	63.20	63.56	64.00	64.00
16	63.69	63.33	63.00	62.60	62.21	62.50	63.20	63.20	63.20	63.59	64.00	64.00
17	63.67	63.31	62.99	62.58	62.19	62.53	63.20	63.20	63.20	63.61	64.00	64.00
18	63.66	63.30	62.97	62.57	62.18	62.57	63.20	63.20	63.20	63.64	64.00	64.00
19	63.65	63.29	62.96	62.56	62.17	62.60	63.20	63.20	63.20	63.66	64.00	64.00
20	63.64	63.28	62.95	62.55	62.16	62.63	63.20	63.20	63.20	63.69	64.00	64.00
21	63.63	63.27	62.94	62.53	62.14	62.67	63.20	63.20	63.20	63.72	64.00	63.99
22	63.62	63.26	62.92	62.52	62.13	62.70	63.20	63.20	63.20	63.74	64.00	63.98
23	63.60	63.24	62.91	62.51	62.12	62.73	63.20	63.20	63.20	63.77	64.00	63.97
24	63.59	63.23	62.90	62.49	62.10	62.77	63.20	63.20	63.20	63.79	64.00	63.95
25	63.58	63.22	62.88	62.48	62.09	62.80	63.20	63.20	63.20	63.82	64.00	63.94
26	63.57	63.21	62.87	62.47	62.08	62.83	63.20	63.20	63.20	63.85	64.00	63.93
27	63.56	63.20	62.86	62.45	62.06	62.87	63.20	63.20	63.20	63.87	64.00	63.92
28	63.55	63.19	62.84	62.44	62.05	62.90	63.20	63.20	63.20	63.90	64.00	63.91
29	63.53		62.83	62.43	62.04	62.93	63.20	63.20	63.20	63.92	64.00	63.90
30	63.52		62.82	62.42	62.03	62.97	63.20	63.20	63.20	63.95	64.00	63.88
31	63.51		62.81		62.01		63.20	63.20		63.97		63.87

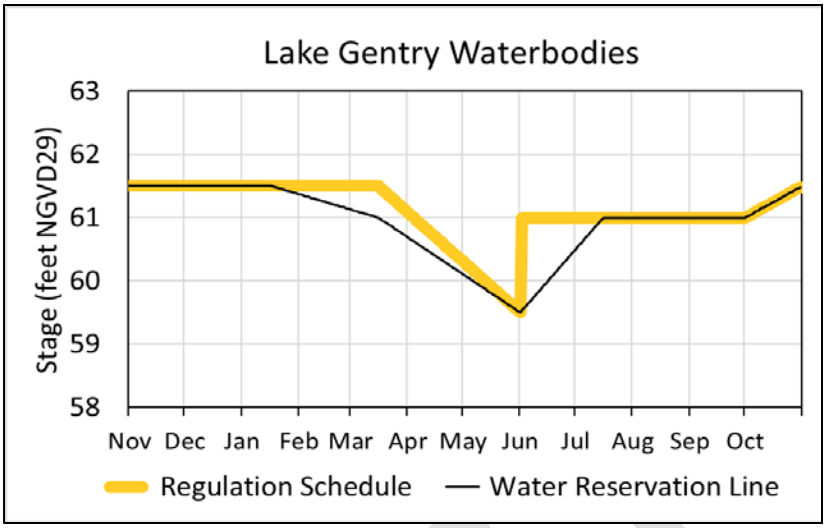
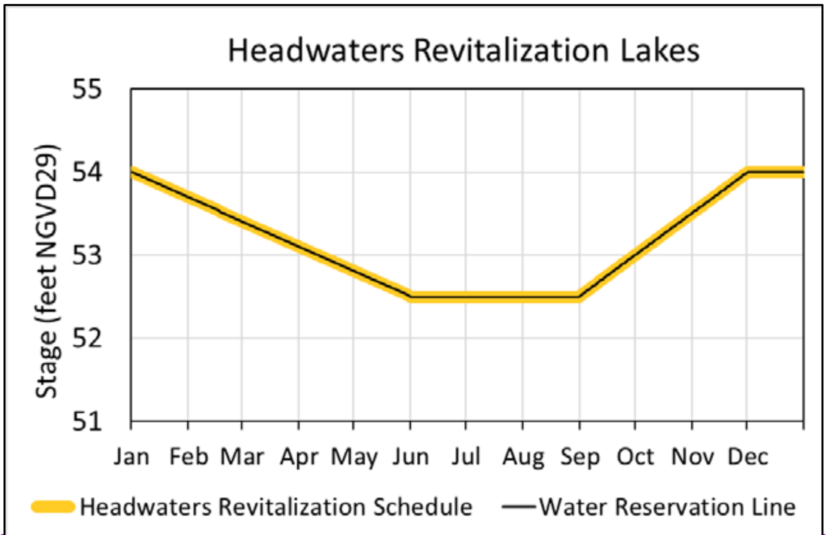


Figure B-6. Hydrograph of the current regulation schedule and the water reservation stage at S-63 (water reservation line) for Lake Gentry reservation waterbodies. All water up to the water reservation line is reserved from allocation for protection of fish and wildlife (derived from data in **Table B-6**).

Table B-6. Maximum daily water reservation stages at S-63 for Lake Gentry reservation waterbodies (black line in **Figure B-6**).

Day	January	February	March	April	May	June	July	August	September	October	November	December
1	61.50	61.37	61.13	60.69	60.10	59.50	60.50	61.00	61.00	61.00	61.50	61.50
2	61.50	61.36	61.12	60.67	60.08	59.53	60.53	61.00	61.00	61.02	61.50	61.50
3	61.50	61.35	61.11	60.65	60.06	59.57	60.57	61.00	61.00	61.03	61.50	61.50
4	61.50	61.34	61.10	60.63	60.05	59.60	60.60	61.00	61.00	61.05	61.50	61.50
5	61.50	61.34	61.09	60.61	60.03	59.63	60.63	61.00	61.00	61.06	61.50	61.50
6	61.50	61.33	61.09	60.59	60.01	59.67	60.67	61.00	61.00	61.08	61.50	61.50
7	61.50	61.32	61.08	60.57	59.99	59.70	60.70	61.00	61.00	61.10	61.50	61.50
8	61.50	61.31	61.07	60.55	59.97	59.73	60.73	61.00	61.00	61.11	61.50	61.50
9	61.50	61.30	61.06	60.53	59.95	59.77	60.77	61.00	61.00	61.13	61.50	61.50
10	61.50	61.29	61.05	60.51	59.93	59.80	60.80	61.00	61.00	61.15	61.50	61.50
11	61.50	61.28	61.04	60.49	59.91	59.83	60.83	61.00	61.00	61.16	61.50	61.50
12	61.50	61.28	61.03	60.47	59.89	59.87	60.87	61.00	61.00	61.18	61.50	61.50
13	61.50	61.27	61.03	60.45	59.87	59.90	60.90	61.00	61.00	61.19	61.50	61.50
14	61.50	61.26	61.02	60.44	59.85	59.93	60.93	61.00	61.00	61.21	61.50	61.50
15	61.50	61.25	61.01	60.42	59.83	59.97	60.97	61.00	61.00	61.23	61.50	61.50
16	61.50	61.24	61.00	60.40	59.81	60.00	61.00	61.00	61.00	61.24	61.50	61.50
17	61.50	61.23	60.98	60.38	59.79	60.03	61.00	61.00	61.00	61.26	61.50	61.50
18	61.49	61.22	60.96	60.36	59.77	60.07	61.00	61.00	61.00	61.27	61.50	61.50
19	61.48	61.22	60.94	60.34	59.75	60.10	61.00	61.00	61.00	61.29	61.50	61.50
20	61.47	61.21	60.92	60.32	59.73	60.13	61.00	61.00	61.00	61.31	61.50	61.50
21	61.47	61.20	60.90	60.30	59.71	60.17	61.00	61.00	61.00	61.32	61.50	61.50
22	61.46	61.19	60.88	60.28	59.69	60.20	61.00	61.00	61.00	61.34	61.50	61.50
23	61.45	61.18	60.86	60.26	59.68	60.23	61.00	61.00	61.00	61.35	61.50	61.50
24	61.44	61.17	60.84	60.24	59.66	60.27	61.00	61.00	61.00	61.37	61.50	61.50
25	61.43	61.16	60.82	60.22	59.64	60.30	61.00	61.00	61.00	61.39	61.50	61.50
26	61.42	61.16	60.81	60.20	59.62	60.33	61.00	61.00	61.00	61.40	61.50	61.50
27	61.41	61.15	60.79	60.18	59.60	60.37	61.00	61.00	61.00	61.42	61.50	61.50
28	61.41	61.14	60.77	60.16	59.58	60.40	61.00	61.00	61.00	61.44	61.50	61.50
29	61.40		60.75	60.14	59.56	60.43	61.00	61.00	61.00	61.45	61.50	61.50
30	61.39		60.73	60.12	59.54	60.47	61.00	61.00	61.00	61.47	61.50	61.50
31	61.38		60.71		59.52		61.00	61.00		61.48		61.50



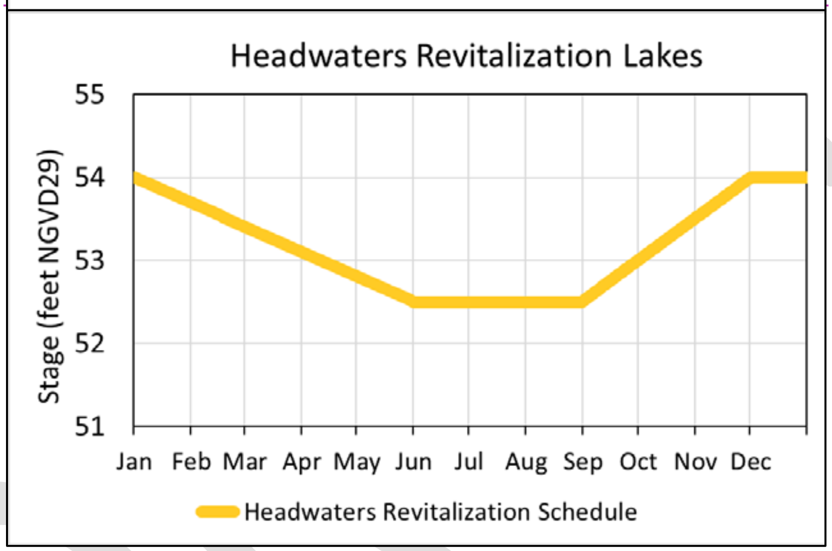


Figure B-7. Hydrograph of the authorized Headwaters Revitalization Schedule (HRS) at S-65 ~~and the water reservation stage (water reservation line~~(derived from data in **Table B-7**) for the Headwaters Revitalization Lakes reservation waterbodies. ~~All water up to the water reservation line is reserved from allocation for protection of fish and wildlife (derived from data in **Table B-7**).~~

Table B-7. ~~Maximum daily water reservation stages~~Stages for the Headwaters Revitalization Lakes reservation waterbodies (~~black~~yellow line in **Figure B-7**).

Day	January	February	March	April	May	June	July	August	September	October	November	December
1	54.00	53.69	53.41	53.10	52.81	52.50	52.50	52.50	52.52	53.01	53.51	54.00
2	53.99	53.68	53.40	53.09	52.80	52.50	52.50	52.50	52.53	53.02	53.53	54.00
3	53.98	53.67	53.39	53.08	52.79	52.50	52.50	52.50	52.55	53.04	53.54	54.00
4	53.97	53.66	53.38	53.07	52.78	52.50	52.50	52.50	52.57	53.05	53.56	54.00
5	53.96	53.65	53.37	53.06	52.77	52.50	52.50	52.50	52.58	53.07	53.58	54.00
6	53.95	53.64	53.36	53.05	52.76	52.50	52.50	52.50	52.60	53.09	53.59	54.00
7	53.94	53.63	53.35	53.04	52.75	52.50	52.50	52.50	52.61	53.10	53.61	54.00
8	53.93	53.63	53.34	53.03	52.74	52.50	52.50	52.50	52.63	53.12	53.62	54.00
9	53.92	53.62	53.33	53.02	52.73	52.50	52.50	52.50	52.65	53.14	53.64	54.00
10	53.91	53.61	53.32	53.01	52.72	52.50	52.50	52.50	52.66	53.15	53.66	54.00
11	53.90	53.60	53.31	53.00	52.71	52.50	52.50	52.50	52.68	53.17	53.67	54.00

Day	January	February	March	April	May	June	July	August	September	October	November	December
12	53.89	53.59	53.30	52.99	52.70	52.50	52.50	52.50	52.70	53.18	53.69	54.00
13	53.88	53.58	53.29	52.98	52.69	52.50	52.50	52.50	52.71	53.20	53.71	54.00
14	53.87	53.57	53.28	52.97	52.68	52.50	52.50	52.50	52.73	53.22	53.72	54.00
15	53.86	53.56	53.27	52.96	52.67	52.50	52.50	52.50	52.74	53.23	53.74	54.00
16	53.85	53.55	53.26	52.95	52.66	52.50	52.50	52.50	52.76	53.25	53.76	54.00
17	53.84	53.54	53.25	52.94	52.65	52.50	52.50	52.50	52.78	53.27	53.77	54.00
18	53.83	53.53	53.24	52.93	52.64	52.50	52.50	52.50	52.79	53.28	53.79	54.00
19	53.82	53.52	53.23	52.92	52.63	52.50	52.50	52.50	52.81	53.30	53.80	54.00
20	53.81	53.51	53.22	52.91	52.62	52.50	52.50	52.50	52.83	53.32	53.82	54.00
21	53.80	53.50	53.21	52.90	52.61	52.50	52.50	52.50	52.84	53.33	53.84	54.00
22	53.79	53.49	53.20	52.89	52.60	52.50	52.50	52.50	52.86	53.35	53.85	54.00
23	53.78	53.48	53.19	52.88	52.59	52.50	52.50	52.50	52.88	53.36	53.87	54.00
24	53.77	53.47	53.18	52.88	52.58	52.50	52.50	52.50	52.89	53.38	53.89	54.00
25	53.76	53.46	53.17	52.87	52.57	52.50	52.50	52.50	52.91	53.40	53.90	54.00
26	53.75	53.45	53.16	52.86	52.56	52.50	52.50	52.50	52.92	53.41	53.92	54.00
27	53.74	53.44	53.15	52.85	52.55	52.50	52.50	52.50	52.94	53.43	53.93	54.00
28	53.73	53.43	53.14	52.84	52.54	52.50	52.50	52.50	52.96	53.45	53.95	54.00
29	53.72	53.42	53.13	52.83	52.53	52.50	52.50	52.50	52.97	53.46	53.97	54.00
30	53.71		53.12	52.82	52.52	52.50	52.50	52.50	52.99	53.48	53.98	54.00
31	53.70		53.11		52.51		52.50	52.50		53.49		54.00

APPENDIX C:
DOCUMENTATION REPORT FOR THE UK-OPS MODEL

FINAL DRAFT

DOCUMENTATION REPORT FOR THE UPPER KISSIMMEE – OPERATIONS SIMULATION (UK-OPS) MODEL

Prepared by:

Calvin J. Neidrauer, P.E.

Hydrology & Hydraulics Bureau

South Florida Water Management District

March 2020

ACKNOWLEDGMENTS

The Upper Kissimmee – Operations Simulation Model was developed at the request of Paul Linton, P.E., former Chief of the Water Management Office at the South Florida Water Management District (SFWMD). Mr. Linton had the initial idea to build an easy-to-use spreadsheet model for testing alternative operations and offered suggestions for features and implementation methods. The author also acknowledges Akin Owosina and Walter Wilcox for allocating budgetary resources to enable completion of model development in the SFWMD's Hydrology and Hydraulics Bureau.

Dr. David Anderson at the SFWMD has been a primary model user and has suggested several useful improvements and new features for testing alternative operations. Dr. Anderson and Dr. Jeff Iudicello, also at the SFWMD, reviewed the draft documentation report and offered many suggestions.

External expert peer reviewers, Dr. Mark Houck, P.E., and Dr. Richard Punnett, P.E., are recognized for their helpful assessments and recommendations to improve both the model and this documentation report.

Special thanks to Natalie Kraft at the SFWMD for applying her outstanding technical editing skills to improve and complete this final document.

EXECUTIVE SUMMARY

Over the past four decades, several regional water resource simulation models, varying in complexity and utility, have been developed by the South Florida Water Management District (SFWMD) for the Upper and Lower Kissimmee Basins. The Upper Kissimmee – Operations Simulation (UK-OPS) Model is a coarse-scale water management simulation model developed to easily and quickly test alternative water operation strategies. Additional model features were created to evaluate the effects of surface water withdrawals based on the draft Kissimmee River and Chain of Lakes Water Reservations rules.

The increasing utility and computational power of Microsoft Excel® made the spreadsheet software program a logical platform to build the UK-OPS Model. The model is a simple, daily timestep, continuous simulation model of the hydrology and operations of the primary lakes in the Upper Kissimmee Basin. Analysts can use the UK-OPS Model to test a variety of operating strategies and receive instant feedback of performance for the primary lake management objectives.

This report describes the purpose, utility, and technical details of the UK-OPS Model. It is not a users' guide, but it is prerequisite reading for analysts who wish to use the model. The UK-OPS Model has been applied to assist with seasonal operations planning, including the SFWMD's monthly Position Analysis, proposed drawdown operations for East Lake Tohopekaliga, and testing the effects of hypothetical surface water withdrawals consistent with the draft Water Reservations rules. Some of these applications are summarized in this report to illustrate appropriate uses of the UK-OPS Model.

The UK-OPS Model and the draft version of this documentation report were peer-reviewed in November 2019. Recommendations for improving the draft documentation report were implemented to complete this final documentation report in March 2020. The model was deemed technically sound, appropriately developed, and usable for the intended applications. The reviewers made some suggestions for improving the model, many of which are under way, particularly the data extension through 2018. The peer-review reports are provided in Appendix D of the main report.

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ACRONYMS AND ABBREVIATIONS

AFET	Alternative Formulation and Evaluation Tool
ALC	Alligator Chain of Lakes
cfs	cubic feet per second
DPA	dynamic position analysis
ET	evapotranspiration
ETO	East Lake Tohopekaliga
GEN	Lake Gentry
GUI	graphical user interface
HMJ	Lakes Hart and Mary Jane
KCH	Lakes Kissimmee, Cypress, and Hatchineha
KRCOL	Kissimmee River and Chain of Lakes
KRRP	Kissimmee River Restoration Project
MPJ	Lakes Myrtle, Preston, and Joel
NGVD29	National Geodetic Vertical Datum of 1929
RF	rainfall
SFWMD	South Florida Water Management District
SFWMM	South Florida Water Management Model
SPF	standard project flood
TOH	Lake Tohopekaliga
UK-OPS	Upper Kissimmee – Operations Simulation (Model)
UKB	Upper Kissimmee Basin
UKISS	Upper Kissimmee Chain of Lakes Routing Model
WNI	watershed net inflow
WRL	water reservation line

1 INTRODUCTION

The development, application, and maintenance of computer simulation models have been part of the overall strategy adopted by the South Florida Water Management District (SFWMD) to manage the complex water resources in Central and South Florida. Several regional models have been deployed over the past decades to support state and federal planning initiatives, including the Comprehensive Everglades Restoration Plan, the Lower East Coast Water Supply Plan, the Northern Everglades Plan, and Lake Okeechobee Operations Planning efforts.

In 2014, the SFWMD recognized the need for a model that would allow rapid testing and evaluation of alternative water management operations in the Upper Kissimmee Basin (UKB). The primary concern was improvement of the flow regime to the Kissimmee River Restoration Project (KRRP) to better meet restoration targets. Such improvement depends on modification of operations that control water levels in the three largest lakes/lake groups in the UKB: Lakes Kissimmee, Cypress, and Hatchineha (KCH); Lake Tohopekaliga (TOH); and East Lake Tohopekaliga (ETO). To meet this need, the SFWMD developed the Upper Kissimmee – Operations Simulation (UK-OPS) Model. The UK-OPS Model initially was developed using Microsoft Excel® 2013 (v15.0) and has been used for several years by modelers, engineers, and scientists. The model has been modified primarily to increase the options for specifying operations in KCH and to evaluate potential surface water withdrawals consistent with the draft Kissimmee River and Chain of Lakes (KRCOL) Water Reservations rules. The most recent version, and the subject of this report, is UK-OPS (v3.12).

The UK-OPS Model performs daily timestep, continuous simulations of the hydrology and operations of the UKB portion of Central and South Florida's water management system for either period-of-record simulations (continuous 49 years) or position analysis simulations (49 one-year simulations, each with the same initial conditions). It has a run time of approximately 4 minutes.

The UK-OPS Model has some limitations. Hydrologic routing is limited to KCH, TOH, and ETO. The inflow series from the smaller lakes are assumed boundary conditions; thus, operations of those lakes are not simulated. Furthermore, although the UK-OPS Model simulates flows to the Kissimmee River at the S-65 and S-65A structures, it does not simulate the complexity of flows and stages within the Kissimmee River and the Lower Kissimmee Basin. The model does not simulate the rainfall-runoff process, rather it relies on the historical record or a detailed model for simulating lateral inflows to the lakes. Detailed hydraulic computations are not performed; instead, the UK-OPS Model approximates the structure stage-discharge hydraulics. Consequently, the UK-OPS Model is not a replacement for the detailed regional hydrologic and water management simulation models that traditionally have been used for analysis and planning of South Florida's water resources.

Detailed hydrologic models, such as the Regional Simulation Model – Basins (VanZee 2011) and the Mike 11/Mike SHE application to the UKB and Lower Kissimmee Basin (SFWMD 2017), are essential for comprehensive analysis of existing and future components of the water management system. Although detailed regional models are the best available tools for performing finer-scale evaluations, they are not suitable for quickly testing a broad range of alternative operations and/or water withdrawal configurations. The UK-OPS Model complements the more detailed models by screening possible alternatives through rapid simulation and evaluation so the detailed models can focus on fewer, more promising alternatives.

UK-OPS Model input requirements include: 1) regulation schedule zones and release rules for KCH, TOH, and ETO; and 2) daily time series (currently 1965 to 2013) of lake stages, inflows, outflows, and evaporation, which are used with the varying lake surface areas to calculate evapotranspiration (ET) volume. Most of these time-series inputs come from historical data or simulated values from detailed regional models.

UK-OPS Model outputs include: 1) typical hydrologic model outputs for the primary lakes—yearly water budgets, daily stage and discharge hydrographs to facilitate in-depth comparative analyses, stage and flow duration curves, and stage and flow percentile plots; and 2) hydrologic performance indicators to summarize and compare key measures among alternative plans/scenarios—reduction in annual mean flow at S-65 to evaluate impacts on the proposed KRCOL Water Reservations, water supply withdrawal reliability, and summaries of maximum stages occurring for user-specified durations.

This report provides readers with a broad view of the basic capabilities and limitations of the UK-OPS Model as well as the details of the algorithms used to simulate the hydrology and water management of the system. This report is not intended to be a comprehensive user's manual for appropriate use of the model and does not contain that level of detail. Furthermore, because initial development of the UKOPS Model focused on immediate applications, efforts were not spent on making the model user-friendly. The model does not contain limits on parameter values or warnings to caution users when results may not be realistic; therefore, the model should be used with substantial professional judgement. Future development efforts may expand and improve the user interfaces. Reading this document is necessary to understand the UK-OPS Model. To use the UK-OPS Model in its current form, interactive training may be necessary.

The need to document and peer review the UK-OPS Model arose in 2019 during the planning effort for the proposed KRCOL Water Reservations rule. Preparation of the draft report was expedited by the Modeling Section of the Hydrology and Hydraulics Bureau of the SFWMD. Recommendations from the formal external peer review were implemented and are reflected in this final report.

This report is organized into the following sections:

1. *Introduction* – A broad summary of the UK-OPS Model and the purpose and structure of this report.

2. *System Hydrology: Water Budget Approach* – An overview of the model domain, system interconnectivity, and the subsystem components, using diagrams and the continuity equation. Data needs and sources also are presented.

3. *Water Management Operating Rules* – The regulation schedules and release rules for the primary lakes: KCH, TOH, and ETO. Options for changing operating regimes also are described.

4. *Model Structure and Organization* – An overview of the organization of the worksheets; explanations of each primary worksheet, including user interfaces; and the general data flow between worksheets.

5. *Model Output* – Various graphical and tabular display summaries of simulated performance that enable evaluation of the simulations.

6. *Model Validation* – Comparison of the UK-OPS Model output with historical data to demonstrate the accuracy of the routing algorithms.

7. *Applications* – UK-OPS Model implementations, including the monthly Position Analysis and scenarios examined to support the proposed KRCOL Water Reservations. These applications represent typical appropriate uses of the UK-OPS Model.

8. *Summary and Recommendations* – Summary of model strengths and limitations and suggestions for future enhancements to improve model accuracy and utility.

2 SYSTEM HYDROLOGY: WATER BUDGET APPROACH

The UK-OPS Model uses a simple water balance approach to simulate the water levels and discharges for the primary hydrologic components of the larger lake systems in the UKB (**Figure 2-1**). This section presents an overview of the system simulated by the model, the subsystems, and their interactions. Also described in this section are the details of the hydrologic components for each subsystem. The specific operating rules and routing procedures used by the UK-OPS Model are presented in **Sections 3** and **4**, respectively.

2.1 System Overview

The SFWMD is the largest of the five water management districts created in 1972 by the Florida Water Resources Act (Chapter 373, Florida Statutes). Within the SFWMD boundaries, from Orlando to the Florida Keys, are 18,000 square miles and a current (2019) population of more than 8.7 million residents. The SFWMD oversees the water resources of the region, and its primary responsibilities include regional flood control, water supply, water quality protection, and ecosystem restoration.

The UKB is the northernmost watershed in the SFWMD and is the headwaters to the Kissimmee-Okeechobee-Everglades ecosystem. Within the UKB, the SFWMD manages the water levels in seven groups of lakes; the three largest are KCH, TOH, and ETO (**Figure 2-1**). Water is discharged from the UKB at S-65 to manage water levels in the upstream lakes and to provide flow to the Kissimmee River and the KRRP. Except for very dry periods, the flow at S-65 eventually is discharged to Lake Okeechobee via S-65E. The S-65A structure receives runoff from the basin bounded by S-65 to S-65A and is the structure regulating inflow to the KRRP. Thus, the operation of S-65A is also important to the KRRP.

The UK-OPS Model simulates the primary water budget components for KCH, TOH, and ETO within the UKB. **Sections 2.2** to **2.4** describe the methodology used by the model for these lakes. **Section 2.5** describes the simulation methodology used by the current version of the UK-OPS Model for the smaller lake systems.

Figure 2-2 shows the flow paths through the UKB Chain of Lakes and the associated water control structures that serve as outlets from each lake or lake system. Outflows from the northern branch of the chain via TOH at S-61 flow to Cypress Lake, which also receives outflow from the eastern branch of the chain from Lake Gentry (GEN) via S-63A. Outflow from Cypress Lake travels through Lake Hatchineha to Lake Kissimmee, which is the largest lake in the UKB. Water from Lake Kissimmee is released to the Kissimmee River via S-65.

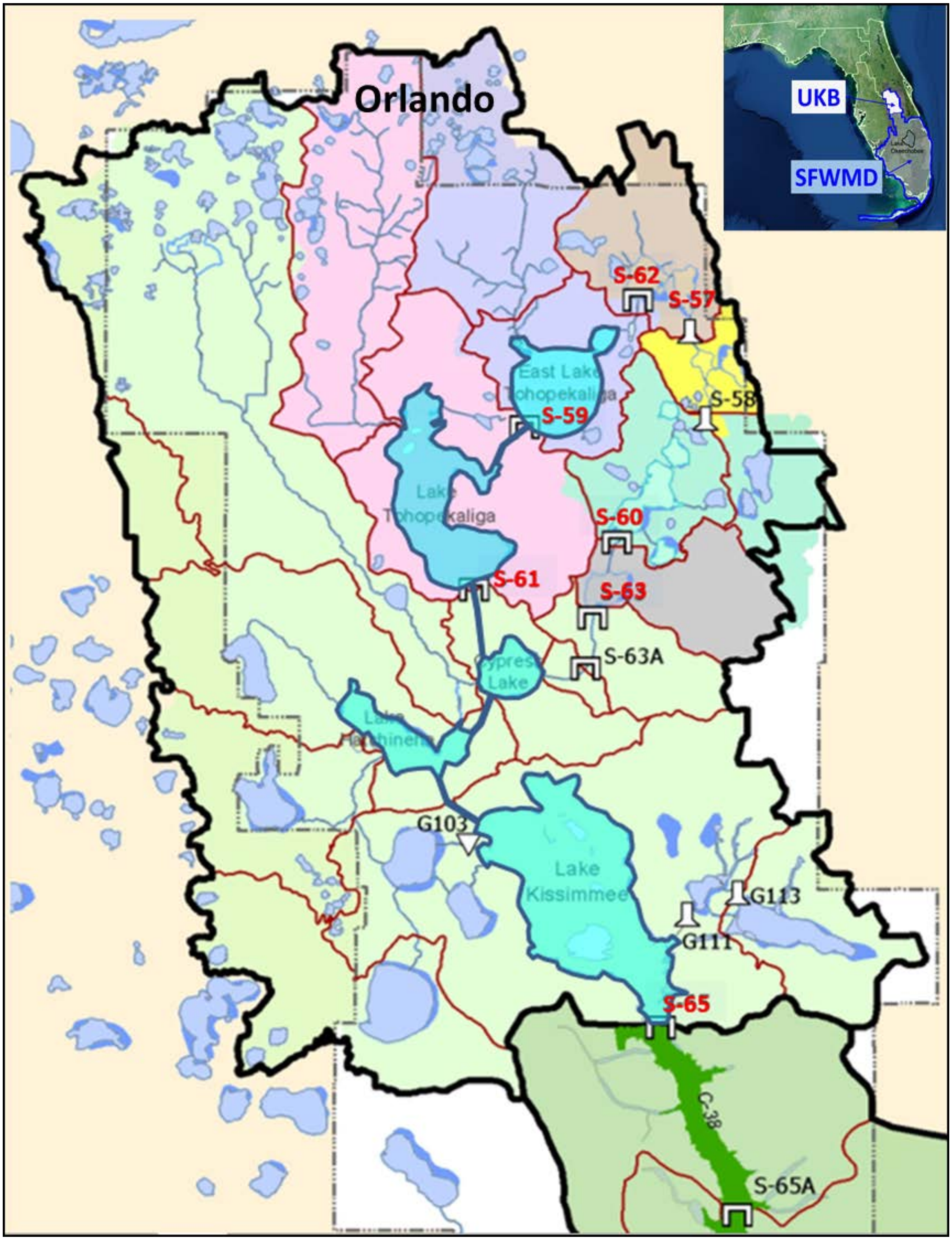

Figure 2-1. Map of the Upper Kissimmee Basin, highlighting the larger lake systems: East Lake Tohopekaliga (ETO), Lake Tohopekaliga (TOH), and Lakes Kissimmee, Cypress, and Hatchineha (KCH).

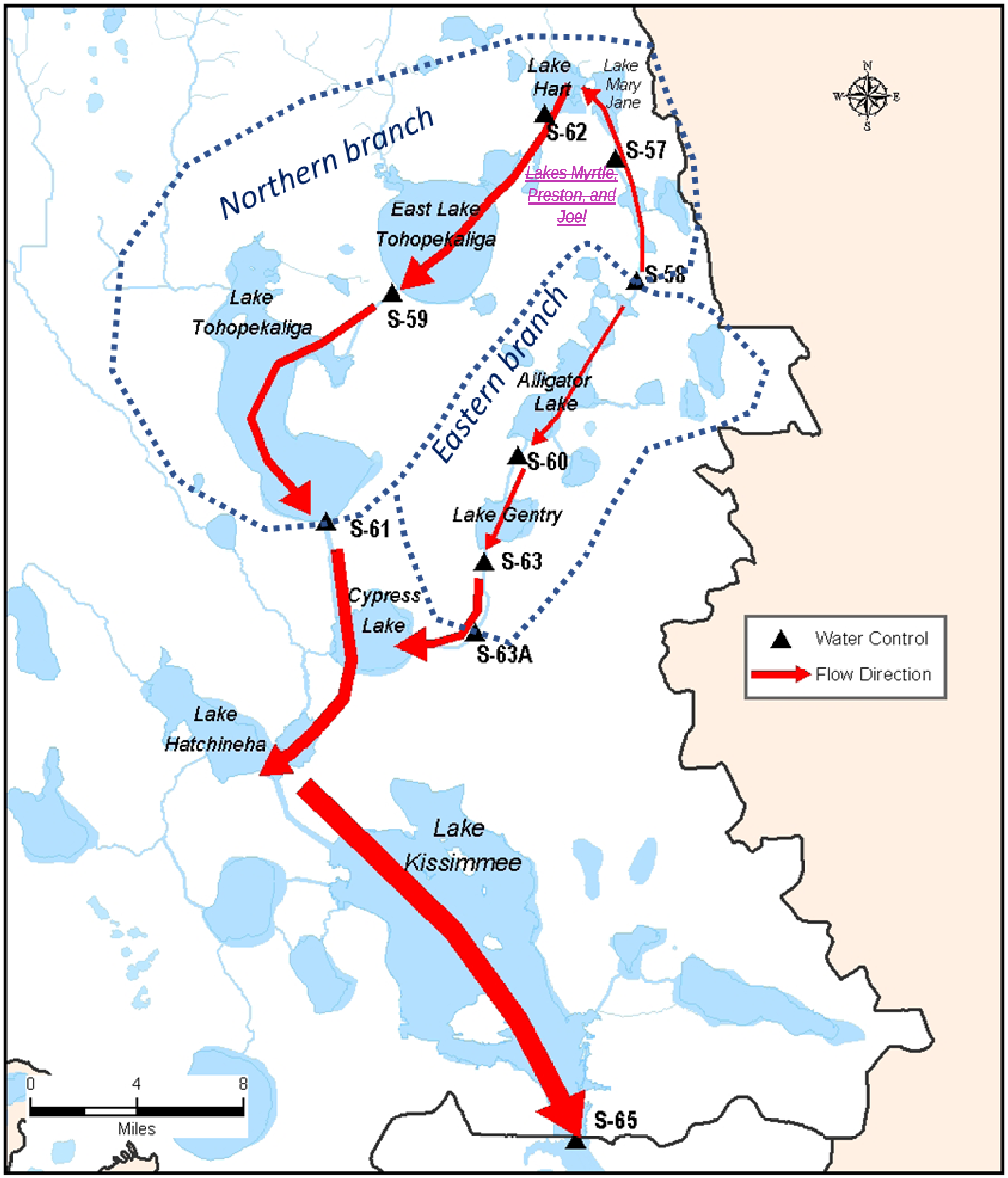

Figure 2-2. Flow paths for the Upper Kissimmee Basin Chain of Lakes.

Figure 2-3 shows the primary user interface of the UK-OPS Model, a Microsoft Excel® application that enables the user to set-up a modeling scenario, run it, and automatically generate numerous post-simulation outputs. The majority of output summaries, including performance summary graphics, can be accessed via this interface. The map is interactive and allows selection of the lake systems to be included in the simulation. The Simulation Scenario Manager allows the user to select the simulation type (continuous or position analysis) and to retrieve and/or run up to four scenarios.

Figure 2-3. User Interface for the Upper Kissimmee – Operations Simulation (UK-OPS) Model.

The remainder of **Section 2** provides a general description of the main water bodies (East Lake Tohopekaliga, Lake Tohopekaliga, Lakes Kissimmee-Cypress-Hatchineha, and the Kissimmee River) and the derivations of the routing, or continuity equations used by the UK-OPS Model. The smaller lakes in the UKB are partially simulated by the UK-OPS Model. Routing is not performed for the smaller lakes in the current version of the model. **Section 2.5** describes the features of the smaller lakes that are included.

2.2 East Lake Tohopekaliga

ETO is the northernmost of the three largest lake systems in the UKB. At the highest stage allowed by the regulation schedule (i.e., winter pool elevation) of 58.0 feet National Geodetic Vertical Datum of 1929 (NGVD29), the surface area of ETO is approximately 12,900 acres. Inflows are from the ETO drainage basin, including Boggy Creek and its drainage basin to the north. Managed inflows via the S-62 gated spillway are from Lakes Hart and Mary Jane (HMJ) to the northeast. Managed outflows are via the S-59 gated spillway, which flows southwest to TOH.

The continuity equation used by the UK-OPS Model to describe the ETO water budget is as follows (and graphically displayed in **Figure 2-4**):

$$\Delta S = RF - ET + WNI + S62 - S59 - [WS] \tag{2.2.1}$$

Where the terms of the water budget (in acre-feet per day) are defined as:

ΔS = change in lake storage

RF = rainfall volume over lake surface area (lumped with WNI)

ET = evapotranspiration volume over variable lake surface area

WNI = watershed net inflow (WNI lumps all other terms of the water budget, including tributary inflows, overland flow, groundwater fluxes, and other inflows and outflows assumed to not change in the simulations.)

S62 = inflow from upstream HMJ

S59 = simulated outflow from ETO

[WS] = optional simulated water supply withdrawal from ETO

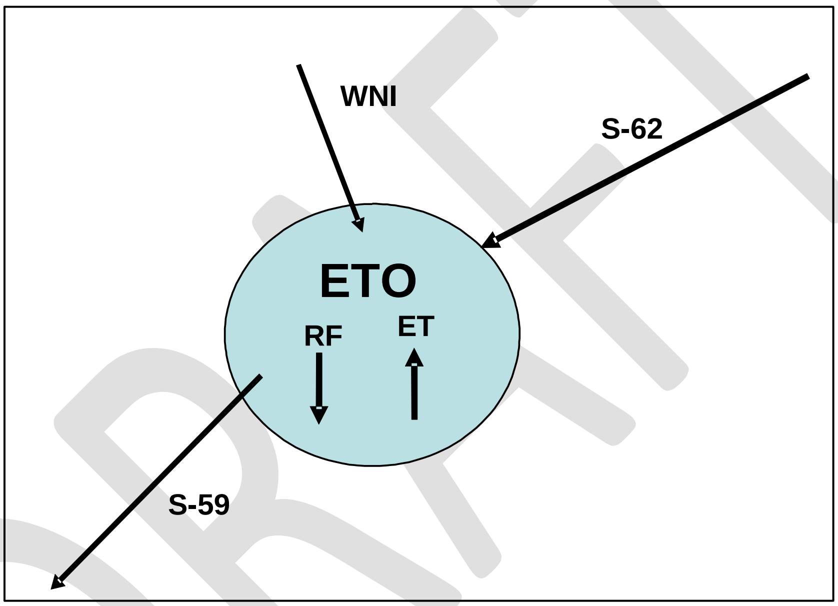

Figure 2-4. East Lake Tohopekaliga water budget components simulated by the UK-OPS Model.

The UK-OPS Model simulates S-59 releases, ET, storage change, and corresponding lake stage using the stage-storage relationship. In the current model, S-62 is an inflow boundary condition based on historical flow data. WNI+RF is an assumed persistent time series for each simulation and an input to the model. The WNI+RF values are preprocessed from historical flow data or from a detailed hydrologic simulation model like the Mike 11/Mike SHE (SFWMD 2017). Based on the continuity equation, and by knowing all the remaining terms of the water budget, WNI+RF can be computed as follows (with WS = 0):

$$\Delta S = (WNI + RF) - ET + S62 - S59$$

Solving this equation for WNI+RF yields:

$$WNI + RF = \Delta S + ET - S62 + S59 \qquad (2.2.2)$$

Where all terms are daily volumes obtained from historical data or the supporting, detailed hydrologic model and are defined as follows:

WNI+RF = watershed net inflow plus rainfall volume over the lake surface area; calculated once and assumed to be a persistent time series for each simulation

$\Delta S = S(h_{t+1}) - S(h_t)$ = change in lake storage during the daily time step; calculated using lake stages and the lake stage-storage relationship

$ET = et_t \cdot A(h_{t-1})$ = evapotranspiration volume; where et_t is the daily evapotranspiration depth and $A(h_{t-1})$ is the lake surface area for the previous day calculated using the lake stage-area relationship

S62 = inflow from upstream HMJ

S59 = outflow from ETO

Once the WNI+RF series is calculated, it is unchanged for UK-OPS Model runs, which simulates the other water budget terms using **Equation 2.2.1**.

2.3 Lake Tohopekaliga

TOH is the second largest lake system in the UKB. At winter pool elevation of 55.0 feet NGVD29, the surface area is approximately 22,000 acres. Inflows are from the TOH drainage basin, including Shingle Creek and its drainage basin to the north. Managed inflows via the S-59 gated spillway are from ETO to the northeast. Managed outflows are via the S-61 gated spillway, which flows south to Cypress Lake.

The continuity equation used by the UK-OPS Model to describe the TOH water budget is as follows (and graphically displayed in **Figure 2-5**):

$$\Delta S = RF - ET + WNI + S59 - S61 - [WS] \qquad (2.3.1)$$

Where the terms of the water budget (in acre-feet per day) are defined as:

ΔS = change in lake storage

RF = rainfall volume over lake surface area (lumped with WNI)

ET = evapotranspiration volume over variable lake surface area

WNI = watershed net inflow (WNI lumps all other terms of the water budget, including tributary inflows, overland flow, groundwater fluxes, and other inflows and outflows assumed to not change in the simulations.)

S59 = simulated inflow from upstream ETO

S61 = simulated outflow from TOH

[WS] = optional simulated water supply withdrawal from TOH

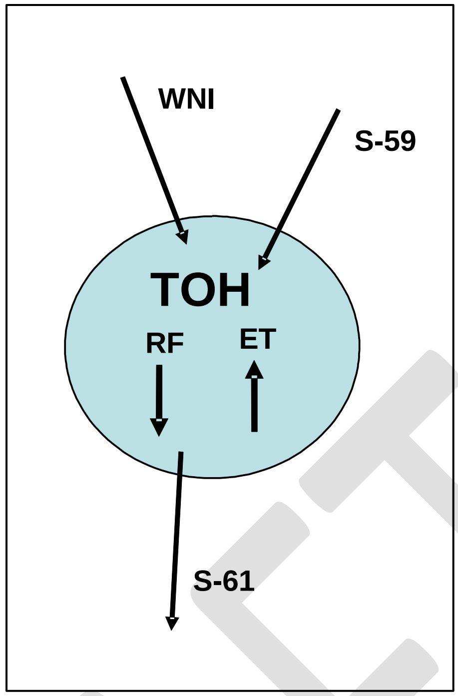

Figure 2-5. Lake Tohopekaliga water budget components simulated by the UK-OPS Model.

The UK-OPS Model simulates all the water budget components except RF and WNI, which are added to become the term WNI+RF. WNI+RF is an assumed, persistent time series for each simulation and is an input to the model. The WNI+RF values are preprocessed from historical flow data or from a detailed hydrologic simulation model like the Mike 11/Mike SHE (SFWMD 2017). Based on the continuity equation, and by knowing all the remaining terms of the water budget, WNI+RF can be computed as follows (with WS = 0):

$$\Delta S = (WNI + RF) - ET + S59 - S61$$

Solving this equation for WNI+RF yields:

$$WNI + RF = \Delta S + ET - S59 + S61 \qquad (2.3.2)$$

Where all terms are daily volumes obtained from historical data or the supporting, detailed hydrologic model and are defined as follows:

WNI+RF = watershed net inflow plus rainfall volume over the lake surface area; calculated once and assumed a persistent time series for each simulation

$\Delta S = S(h_{t+1}) - S(h_t)$ = change in lake storage during the daily time step; calculated using lake stages and the lake stage-storage relationship

$ET = et_t \cdot A(h_{t-1})$ = evapotranspiration volume; where et_t is the daily evapotranspiration depth and $A(h_{t-1})$ is the lake surface area for the previous day calculated using the lake stage-area relationship

S59 = inflow from upstream ETO

S61 = outflow from TOH

Once the WNI+RF series is calculated, it is unchanged for UK-OPS Model runs, which simulates the other water budget terms using **Equation 2.3.1**.

2.4 Lakes Kissimmee, Cypress, and Hatchineha

KCH is the largest of the lake systems in the UKB. The three lakes of the KCH system are operated as a single water body because there are no intermediate water control structures in the system. The UK-OPS Model simulates the system as a single lake. At the current winter pool elevation of 52.5 feet NGVD29, the surface area is approximately 61,000 acres. Inflows are from the KCH drainage basins, including Reedy Creek and its drainage basin to the north. Managed inflows are from TOH to the northeast via the S-61 gated spillway and from eastern portion of the UKB Chain of Lakes via S-63A. Managed outflows from KCH are via the S-65 gated spillway, which flows south to the Kissimmee River.

The continuity equation used by the UK-OPS Model to describe the KCH water budget is as follows (and graphically displayed in **Figure 2-6**):

$$\Delta S = [RF + WNI + S63A] - ET + S61 - S65 \qquad (2.4.1)$$

Where the terms of the water budget (in acre-feet per day) are defined as:

ΔS = change in lake storage

RF = rainfall volume over lake surface area (lumped with WNI)

ET = evapotranspiration volume over variable lake surface area

WNI = watershed net inflow (WNI lumps all other terms of the water budget, including tributary inflows, overland flow, groundwater fluxes, and other inflows and outflows assumed to not change in the simulations.)

S61 = simulated inflow from upstream TOH

S63A = boundary condition inflow from GEN and the southeastern portion of the UKB Chain of Lakes (Note: This term is assumed to not change with the simulations. It is not explicitly used and is implicitly part of WNI.)

S65 = simulated outflow to the Kissimmee River

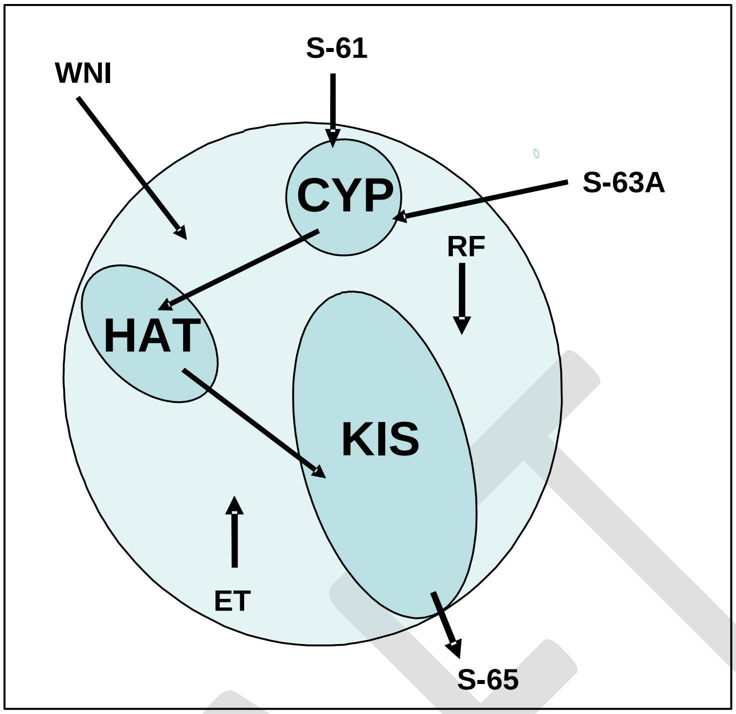

Figure 2-6. Lakes Kissimmee, Cypress, and Hatchineha (KCH) water budget components simulated by the UK-OPS Model.

The UK-OPS Model simulates all the water budget components except for S-63A, RF, and WNI. Flow from S-63A is a boundary condition. S-63A flow is assumed to be the same as historical, or the same as that simulated by the detailed hydrologic model (e.g., the Mike 11/Mike SHE). RF and WNI are added to become the term WNI+RF, which is an assumed, persistent time series for each simulation and is an input to the model. The WNI+RF values also are preprocessed from historical flow data or from the supporting, detailed hydrologic simulation model. Based on the continuity equation, and by knowing all the remaining terms of the water budget, WNI+RF is computed as follows:

$$\Delta S = (WNI + RF) - ET + S61 - S65 \text{ (S63A is part of WNI)}$$

Solving this equation for WNI+RF yields:

$$WNI + RF = \Delta S + ET - S61 + S65 \qquad (2.4.2)$$

Where all terms are daily volumes obtained from historical data or the supporting, detailed hydrologic model and are defined as follows:

WNI+RF = watershed net inflow plus rainfall volume over the lake surface area; calculated once and assumed a persistent time series for each simulation

$\Delta S = S(h_{t+1}) - S(h_t)$ = change in lake storage during the daily time step; calculated using lake stages and the lake stage-storage relationship

$ET = et_t \cdot A(h_{t-1})$ = evapotranspiration volume; where et_t is the daily evapotranspiration depth and $A(h_{t-1})$ is the lake surface area for the previous day calculated using the lake stage-area relationship

S61 = inflow from TOH

S65 = outflow to the Kissimmee River

Once the WNI+RF series is calculated, it is unchanged for UK-OPS Model runs, which simulates the other water budget terms using **Equation 2.4.1**.

2.5 Small Lakes in the Upper Kissimmee Basin

This section describes the approach used in the UK-OPS Model for the small lakes that are connected and contribute inflow to the larger lake systems described in **Sections 2.2** to **2.4**. The small lake systems include HMJ; Lakes Myrtle, Preston, and Joel (MPJ); the Alligator Chain of Lakes (ALC); and GEN. **Figure 2-2** shows the flow paths and proximity of the small lake systems to the larger systems. **Figure 2-7** shows how the smaller lake systems connect to the larger systems.

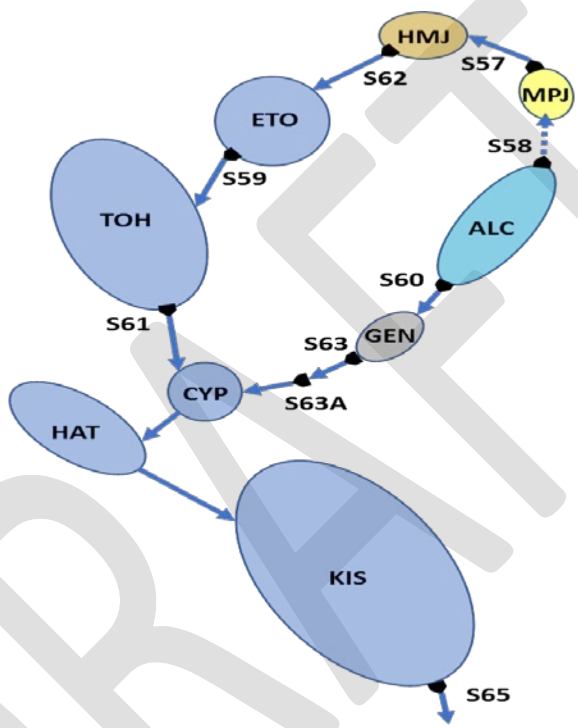

Figure 2-7. Small lake systems and their connections to the large lake systems in the Upper Kissimmee Basin.

Outflows from the small lakes generally end up in Lake Cypress. Outflows from ALC can move south via the S-60 gated spillway or north via the S-58 gated culvert. For larger flows, the southern route typically is used because it has higher capacity. The model does not simulate outflows from the small lakes. However, for evaluating water supply withdrawals from the small lakes, the model assumes flows from ALC and GEN are to Lake Cypress (KCH system) and flows from MPJ and HMJ are to ETO.

The UK-OPS Model partially simulates the small lake systems; no routing is performed for these lakes. For operations planning simulations, which usually involve only the larger lakes, the hydrology of the small lake systems is not important because the outflows from these lakes are implicitly part of the WNI term. For evaluating proposed surface water withdrawal scenarios subject to the draft KRCOL Water Reservation rules, an approximation was made, as described below.

The draft KRCOL Water Reservation rules were designed to allow water supply withdrawals to occur when they do not adversely impact the water resources and associated ecology of the lake systems and the KRRP. The rules basically define constraints that determine when water supply withdrawals can occur.

To evaluate the effects of surface water withdrawals under the draft KRCOL Water Reservation rules, the UK-OPS Model compared the small lake stage series with the water reservation line (WRL) (**Section 4.3**). If the lake stage is above the WRL and the other rule criteria are met, then water supply withdrawals can occur. Recognizing the withdrawal may reduce outflow from the small lake system and affect the downstream large lake system, the UK-OPS Model assumes the withdrawal is directly from the downstream large lake system. Therefore, for withdrawals from MPJ and/or HMJ, the simulation determines the timing of the withdrawal using the stage and WRL of the small lake but makes the withdrawal from ETO. And for withdrawals from ALC and/or GEN, the simulation determines the timing of the withdrawal using the stage and WRL of the small lake but makes the withdrawal from KCH.

This simplifying assumption, to make the withdrawal from the next downstream large lake, was made for expediency and with recognition that building full routing capability for four more lake systems would add significantly to the computational burden of this Microsoft Excel® model. Building routing capability for the small lakes is a possible future improvement to the UK-OPS Model, but the likely minor increased benefit should be weighed with the increased computational burden and slower run times.

3 WATER MANAGEMENT OPERATING RULES

3.1 Overview

The UK-OPS Model simulates the management of releases from the larger lake systems in the UKB using rules that mimic the regulation schedules and associated release guidance criteria. This section describes these rules and their implementation in the model. Also presented in this section are some of the options built into the model for simulating alternative release strategies.

3.2 East Lake Tohopekaliga Regulation Schedule

The ETO regulation schedule (**Figure 3-1**) specifies releases at S-59 based on lake stage. The ETO regulation schedule rules traditionally have been designed to simply discharge water whenever the lake stage is above the schedule (Zone A). Releases in Zone B can be made for environmental purposes, navigation, and water supply, but are not necessary to manage the lake stage.

Figure 3-2 illustrates the ETO regulation schedule as seen by the UK-OPS Model. Up to six zones can be defined. The zones are numbered, and the labeled lines represent the bottom of each zone. The green line (Zone 4) represents the drawdown operation used in 2018 and 2019 to benefit in-lake fish and wildlife resources. The drawdowns initiated at an elevation of 57.60 feet NGVD29 on January 15. The dashed line (Zone 6) represents a 0.3-foot offset above the Zone A line (Zone 5) that can be used to transition flows up to the maximum discharge. The model can simulate a linear transition from zero to maximum discharge in this range, if specified.

The UK-OPS Model uses a zone-discharge function to specify discharge rates within the regulation schedule zones. Consistent with the regulation schedule zone labeling, the zone-discharge function places the zone number at the bottom of the zone. For ETO (**Figure 3-3**), the function is relatively simple. Zero discharge for all zones below Zone 4. Within Zone 4 (between the green line and the Zone 5 black line in **Figure 3-2**), discharge linearly increases with stage from 750 to 1,300 cubic feet per second (cfs). Above Zone 5, continue with 1,300 cfs, which is the maximum S-59 capacity assumed by the model. In this case, there is no transition specified for Zone 5. For stages above the Zone 5 line (same as bottom of Zone A), the model simulates the maximum hydraulic capacity of S-59, considering the headwater and tailwater stages approximated by the simulated stages in ETO and TOH, respectively. Note from **Figure 3-1**, the stated S-59 design capacity is 820 cfs, which is less than the 1,300 cfs maximum capacity in **Figure 3-3**.

The standard project flood (SPF) discharge rate for S-59 is 1,300 cfs, which can be reached under high stage conditions. The model simulates this capability even though it exceeds the design, which is based on 30% of the SPF discharge rate.

UK-OPS Model users can specify the breakpoints of the ETO regulation schedule and the zone-discharge function by changing the values in the color-coded tables within the ETOops worksheet. The regulation schedule and the zone-discharge function graphics automatically display changes to the inputs to enable verification of the intended changes.

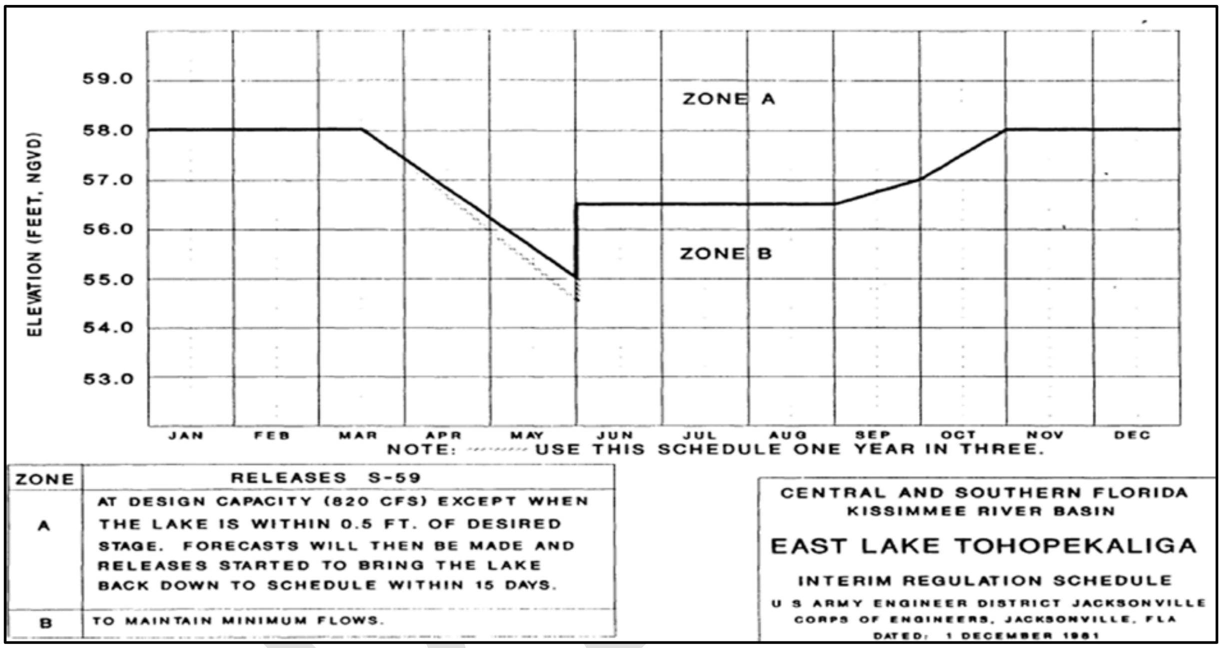

Figure 3-1. East Lake Tohopekaliga regulation schedule.

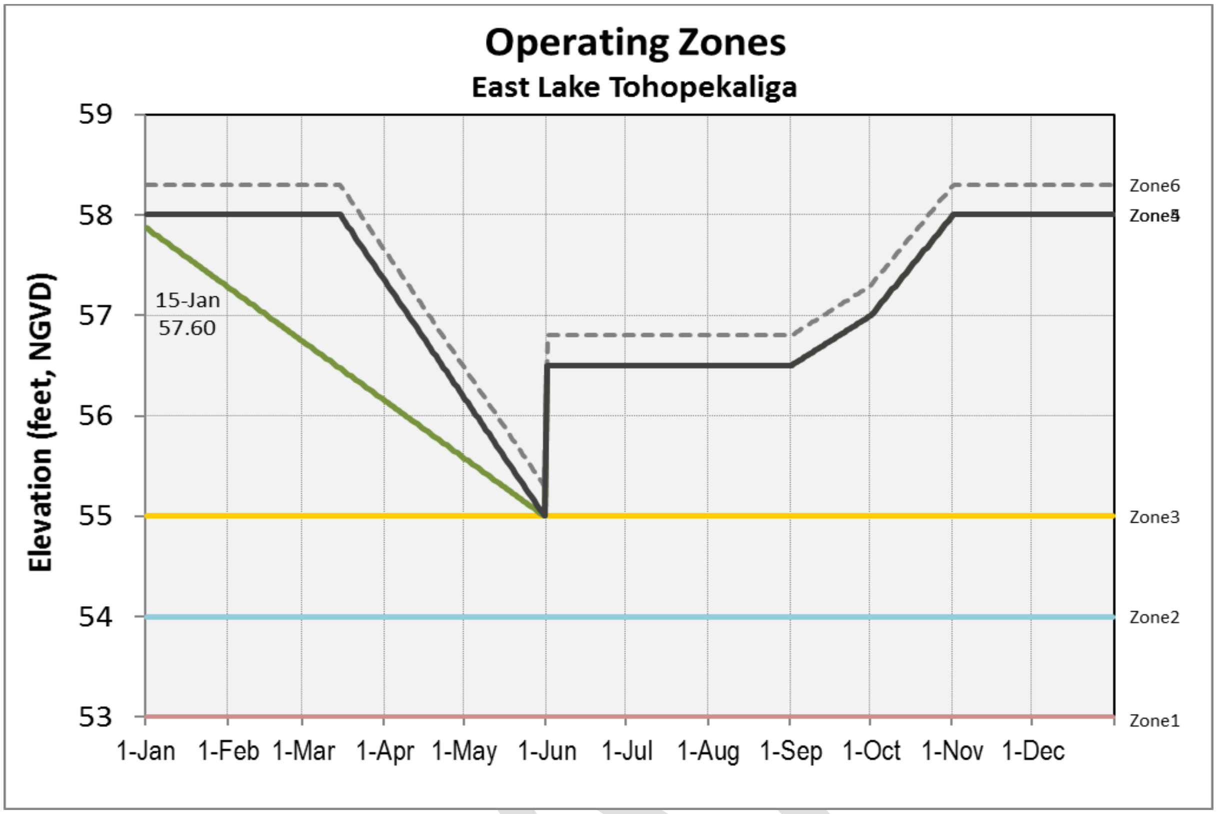

Figure 3-2. East Lake Tohopekaliga regulation schedule as seen by the UK-OPS Model.

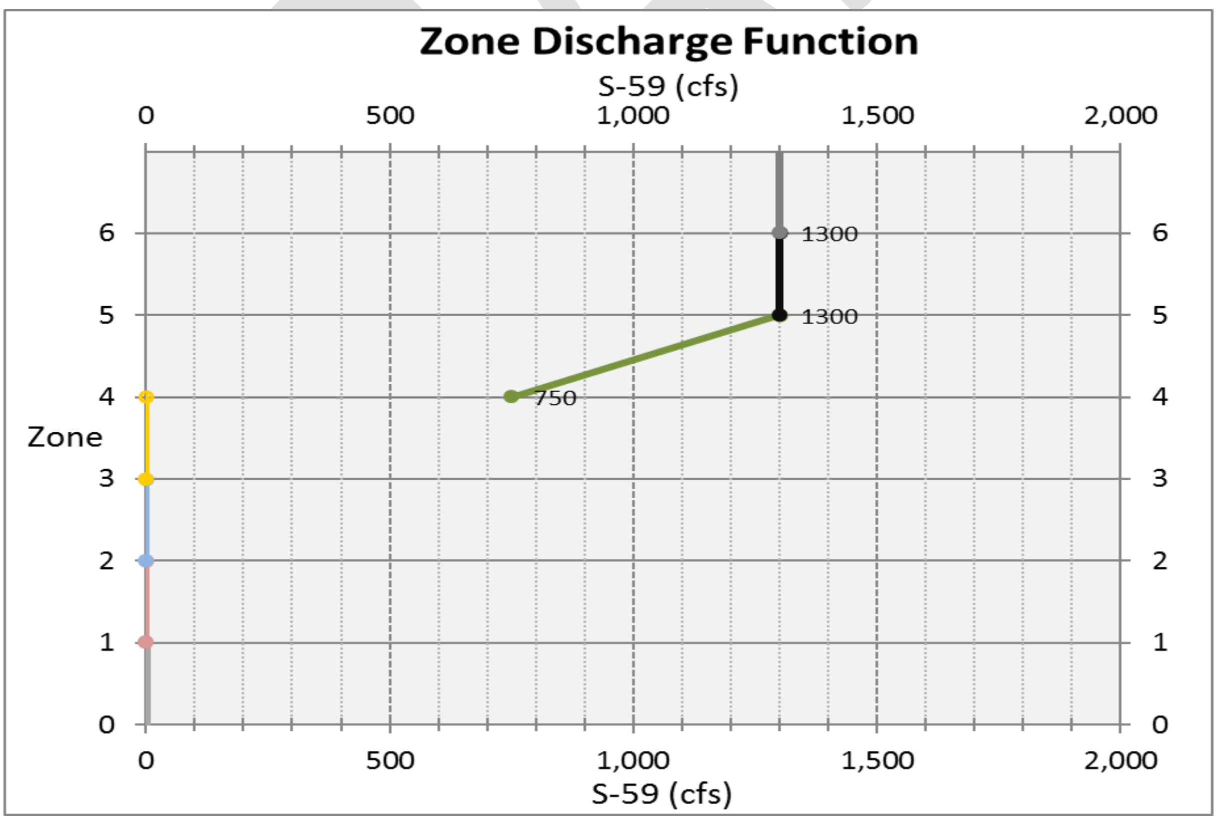

Figure 3-3. East Lake Tohopekaliga zone discharge function used by the UK-OPS Model.

3.2.1 Hydraulic Capacity Assumptions for S-59

The S-59 single-gated spillway capacity (100% of the SPF) of 1,300 cfs occurs at the SPF headwater and tailwater stages. Real system operations must account for various factors to determine the appropriate spillway gate opening and discharge rate, including maximum allowable gate opening (MAGO) criteria to keep discharge velocities from exceeding design limits and maximum permissible head (MPH) across the structure. These criteria are not explicitly considered by the daily timestep routing model, but the model does calculate the upper limit of S-59 discharge capability (S59Qcap) using the daily simulated upstream and downstream lake stages, which is capped by the user-input S59maxcap, currently set to 1,300 cfs.

The S-59 discharge capacity (1,300 cfs) also is the 99th percentile value of the historical flow data (1965 to 2005). Maximum flow during the historical period was 2,160 cfs; however, this maximum is not recommended for S59maxcap because it is excessively high and inappropriate as an upper limit for simulating long-term performance. If flood peaks are of interest, more refinement to the model or a finer timestep hydraulic model may be needed.

Details about the daily S-59 hydraulic capacity computation (S59Qcap) are contained within the ETOops and ETOsim worksheets and are described below.

S59Qcap is the structure's hydraulic capacity, which is approximated by the UK-OPS Model as:

$$\text{S59Qcap} = \text{K}(HWEL - CEL)\sqrt{HWEL - TWEL} \tag{3.2.1}$$

Where:

HWEL = S59Hsim

CEL = 49.1 feet crest elevation

TWEL = S61Hsim

K = 125, derived from the following traditional orifice flow equation:

$$\text{Q} = \text{CA}\sqrt{2g(HWEL - TWEL)} \tag{3.2.2}$$

Where:

C = empirical discharge coefficient

A = L(HWEL-CEL)

g = gravity of Earth (32.2 ft/s^2)

L = gate width

By taking the ratio of Q/Q*, where Q* is the same equation using the SPF information, **Equation 3.2.1** can be derived. **Equation 3.2.1** is used by the UK-OPS Model for daily timestep approximation of the dynamic structure capacity. As described previously, S59Qcap cannot be larger than S59maxcap, which currently is set to the SPF capacity of 1,300 cfs.

3.2.2 Temporary Pump Capacity Assumptions for S-59

For testing scenarios such as ETO stage drawdown operations, which aim to periodically lower the lake stage below the elevation of the downstream TOH, the UK-OPS Model has a feature that allows specification of temporary pumps in parallel with the S-59 gated spillway. The ETOops worksheet allows specification of the average daily pump flow rate (S59pumpcap) and has an option to supplement gravity releases with pumping when the spillway capacity is less than the target release. Simultaneous gravity flow and pumping are simulated, and the user can specify a percent reduction in gravity capacity when pumping is used simultaneously. This accounts for the reduced spillway discharge rate due to the rise in tailwater stage from pumping (**Figure 3-4**). Such a condition can happen when the water level difference across the structure (Δh) is small but positive. Thus, gravity flow capability is possible, but it may be smaller than desired, and pumping is necessary to meet the desired flow target. Such a simultaneous use condition may be short-lived as the headwater elevation recedes below the tailwater elevation and water level difference across the structure becomes negative.

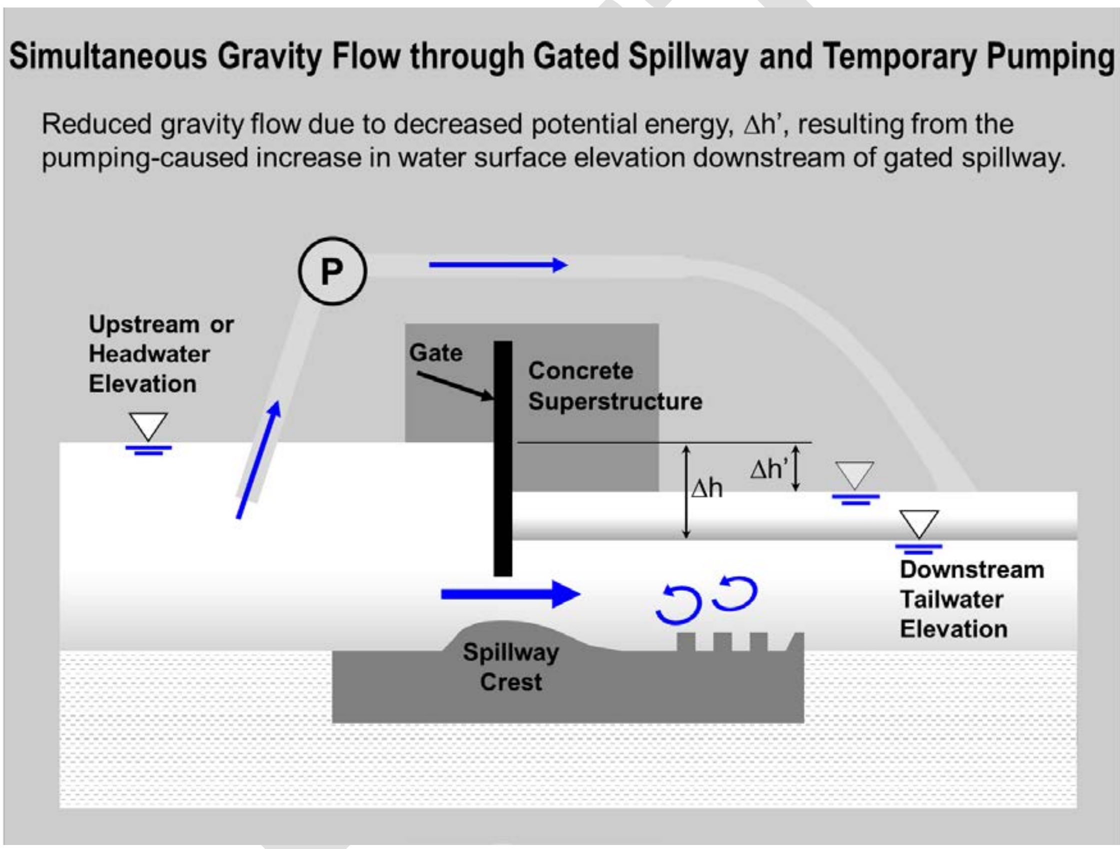

Figure 3-4. Simultaneous gated spillway gravity flow and temporary pumping.

3.2.3 Options for Simulating S-59 Operations

The UK-OPS Model has a few ways to simulate S-59 releases, which allows for testing alternative operations. **Table 3-1** shows the various settings of the parameter QoptETO, which is specified in the ETOops worksheet.

Table 3-1. Optional UK-OPS Model operations for S-59 and East Lake Tohopekaliga.

Parameter	Definition
QoptETO = 0	Flow values set to inputs for testing routing calculations
QoptETO = 1	Releases per operating zones and zone-discharge function
QoptETO = 2	Same as Option 1 but gravity releases are supplemented with pumping when the spillway capacity is less than the target release (Qregadj).
QoptETO = 3	Fixed, unrealistic 200 cubic feet per second release [placeholder for future option and code in routing worksheet (ETOsim)]
QoptETO = 4	Releases per user-specified logic in routing worksheet (ETOsim) Currently set up to determine releases necessary to achieve user-specified stage recession rates within user-specified dates

3.3 Lake Tohopekaliga Regulation Schedule

The TOH regulation schedule (**Figure 3-5**) specifies releases at S-61 depending on lake stage. The TOH regulation schedule rules traditionally have been designed to simply discharge water whenever the lake stage is above the schedule (Zone A). Releases in Zone B can be made for environmental purposes, navigation, and water supply, but are not necessary to manage the lake stage.

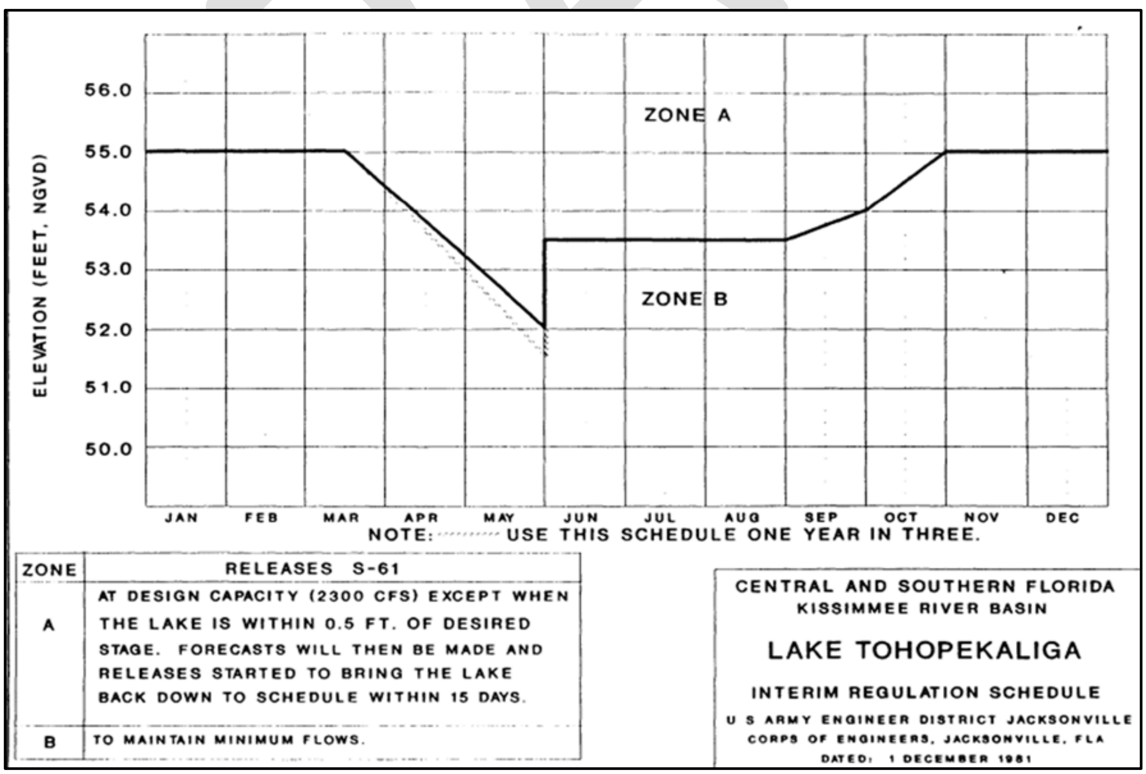

Figure 3-5. Lake Tohopekaliga regulation schedule.

Figure 3-6 illustrates the TOH regulation schedule as seen by the UK-OPS Model. Up to six zones can be defined. The zones are numbered, and the labeled lines represent the bottom of the zone. The green line (Zone 4) represents the drawdown operation used in 2018 and 2019 to benefit in-lake fish and wildlife resources. The drawdowns initiated at an elevation of 54.60 feet NGVD29 on January 15. The dashed line (Zone 6) represents a 0.3-foot offset above the Zone A line (Zone 5) that can be used to transition flows up to the maximum discharge. The model can simulate a linear transition from zero to maximum discharge in this range, if specified.

The UK-OPS Model uses a zone-discharge function to specify discharge rates within the regulation schedule zones. Consistent with the regulation schedule zone labeling, the zone-discharge function places the zone number at the bottom of the zone. For TOH (**Figure 3-7**), the function is relatively simple. Zero discharge for all zones below Zone 4. Within Zone 4 (between the green line and the Zone 5 black line in **Figure 3-6**), discharge linearly increases with stage from 1,150 to 2,300 cfs. Above Zone 5, continue with 2,300 cfs, which is the maximum S-61 capacity assumed by the model. In this case, there is no transition specified for Zone 5. For stages above the Zone 5 line (same as bottom of Zone A), the model simulates the maximum hydraulic capacity of S-61, considering the headwater and tailwater stages approximated by the simulated stages in TOH and KCH, respectively.

UK-OPS Model users can specify the breakpoints of the TOH regulation schedule and the zone-discharge function by changing the values in the color-coded tables within the TOHops worksheet. The regulation schedule and the zone-discharge function graphics automatically display changes to the inputs to enable verification of the intended changes.

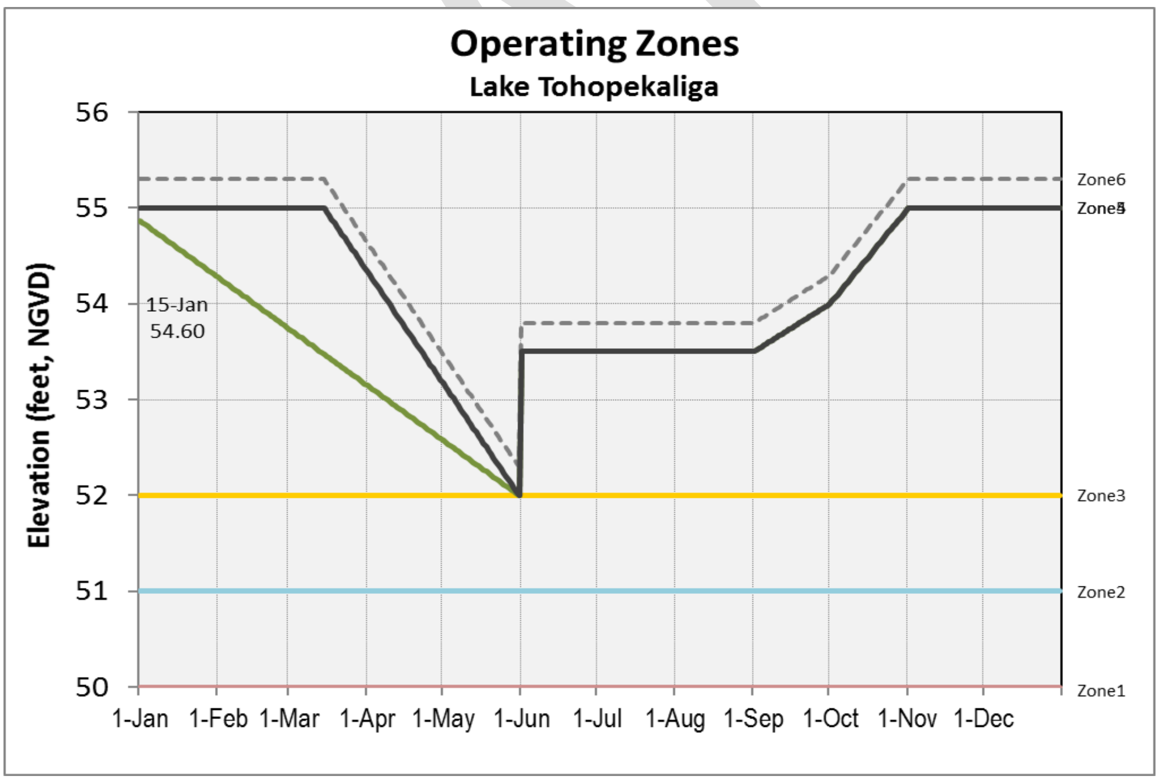

Figure 3-6. TOH regulation schedule as seen by the UK-OPS Model.

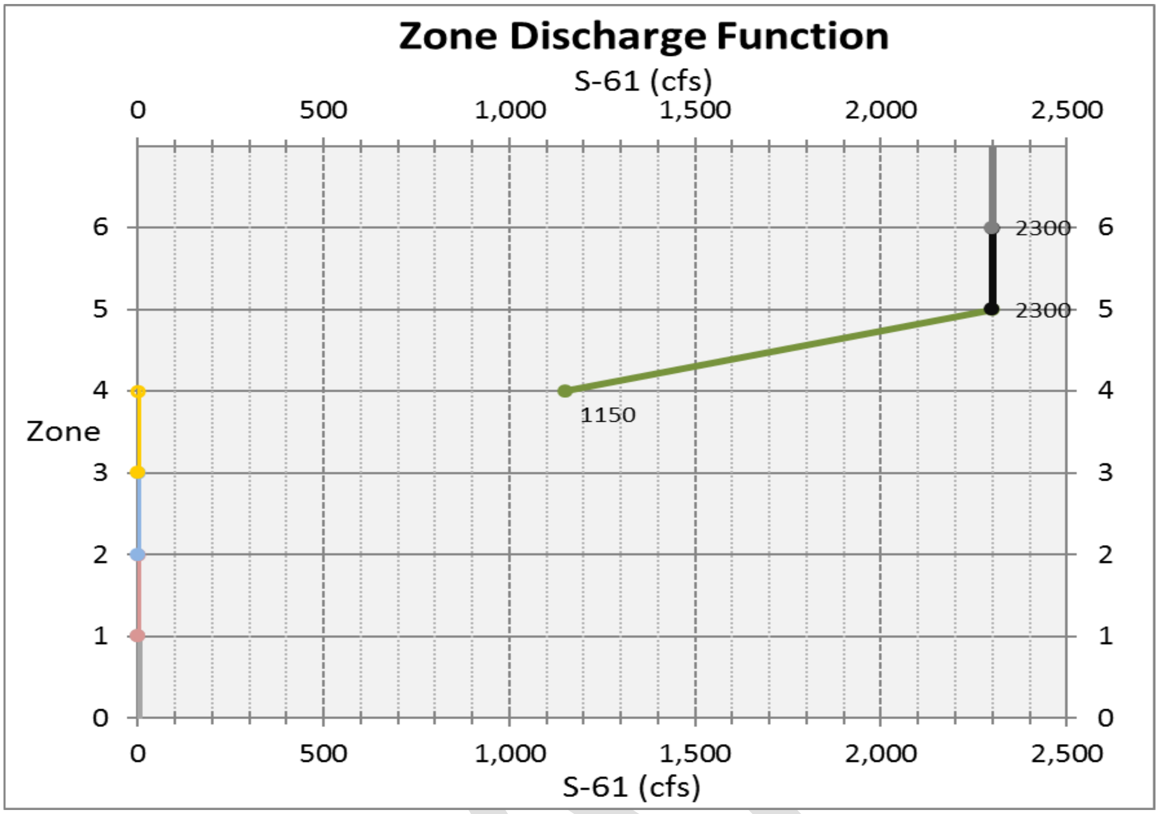

Figure 3-7. TOH zone discharge function used by the UK-OPS Model.

3.3.1 Hydraulic Capacity Assumptions for S-61

The S-61 single-gated spillway has a design capacity of 2,300 cfs at the design headwater and tailwater stages. Real system operations must account for various factors to determine the appropriate spillway gate opening and discharge rate, including maximum allowable gate opening (MAGO) criteria to keep discharge velocities from exceeding design limits and maximum permissible head (MPH) across the structure. These criteria are not explicitly considered by the daily timestep routing model. However, the S-61 capacity (S61Qcap) is computed daily using the simulated upstream and downstream stages and is limited by the user-input S61maxcap, currently set to 2,300 cfs.

The S-61 design discharge (2,300 cfs) also is the 98th percentile value of the historical flow data (1965 to 2005). The 99th percentile was 2,600 cfs. Maximum flow during the historical period was 3,750 cfs; however, this maximum is not recommended for S61maxcap because it is excessively high and inappropriate as an upper limit for simulating long-term performance. If flood peaks are of interest, more refinement to the model or a finer timestep hydraulic model may be needed.

Details about the daily S-61 hydraulic capacity computation (S61Qcap) are contained within the TOHops and TOHsim worksheets and are described below.

S61Qcap is the structure's hydraulic capacity, which is approximated by the UK-OPS Model as:

$$\mathrm{S61Qcap} = \mathrm{K}(HWEL - CEL)\sqrt{HWEL - TWEL} \qquad (3.3.1)$$

Where:

HWEL = S61Hsim

TWEL = S65Hsim

CEL = 36.9 feet crest elevation

K = 190, derived from the following traditional orifice flow equation:

$$\mathrm{Q} = \mathrm{CA}\sqrt{2g(HWEL - TWEL)} \qquad (3.3.2)$$

Where:

C = empirical discharge coefficient

A = L(HWEL-CEL)

g = gravity of Earth (32.2 ft/s^2)

L = gate width

By taking the ratio of Q/Q*, where Q* is the same equation using the design information, **Equation 3.3.1** can be derived. **Equation 3.3.1** is used by the UK-OPS Model for daily timestep approximation of the dynamic structure capacity. As described previously, S61Qcap cannot be larger than S61maxcap, which currently is set to the design capacity of 2,300 cfs.

3.3.2 Temporary Pump Capacity Assumptions for S-61

For testing scenarios such as TOH stage drawdown operations, which aim to periodically lower the lake stage below the elevation of the downstream KCH, the UK-OPS Model has a feature that allows specification of temporary pumps in parallel with the S-61 gated spillway. The TOHops worksheet allows specification of the average daily pump flow rate (S61pumpcap) and has an option to supplement gravity releases with pumping when the spillway capacity is less than the target release. Simultaneous gravity flow and pumping are simulated, and the user can specify a percent reduction in gravity capacity when pumping is used simultaneously. This accounts for the reduced spillway discharge rate due to the rise in tailwater stage from pumping (**Figure 3-4**).

3.3.3 Options for Simulating S-61 Operations

The UK-OPS Model has a few ways to simulate S-61 releases, which allows for testing alternative operations. **Table 3-2** shows the various settings of the parameter QoptTOH, which is specified in the TOHops worksheet.

Table 3-2. Optional UK-OPS Model operations for S-61 and Lake Tohopekaliga.

Parameter	Definition
QoptTOH = 0	Flow values set to inputs for testing routing calculations
QoptTOH = 1	Releases per operating zones and zone-discharge function
QoptTOH = 2	Same as Option 1, but gravity releases are supplemented with pumping when the spillway capacity is less than the target release (Qregadj).
QoptTOH = 3	Fixed, unrealistic 200 cubic feet per second release [placeholder for future option and code in routing worksheet (TOHsim)]
QoptTOH = 4	Releases per user-specified logic in routing worksheet (TOHsim) Currently set up to determine releases necessary to achieve user-specified stage recession rates within user-specified dates

3.4 Lakes Kissimmee, Cypress, and Hatchineha Regulation Schedule

The KCH regulation schedule specifies releases at S-65 depending primarily on lake stage. The KCH regulation schedule rules originally were designed to simply discharge water whenever the lake stage was above the schedule (**Figure 3-8**). However, during construction of the KRRP, an interim regulation schedule (**Figure 3-9**) and subsequent modifications to Zone B operations, were used. Interim operations were intended to be used until the Headwaters Revitalization regulation schedule is implemented upon completion of the KRRP (**Figure 3-10**). (It is important to note that new science and experience gained during the years of KRRP construction have yielded proposed refinements to the Headwaters Revitalization regulation schedule, particularly below Zone A.)

The KCH regulation schedule is more complex than the ETO and TOH schedules. The KCH schedule includes provisions that consider hydrologic conditions in the downstream Kissimmee River. Therefore, the options in the UK-OPS Model for simulating alternative operations of KCH are more complex than for ETO and TOH.

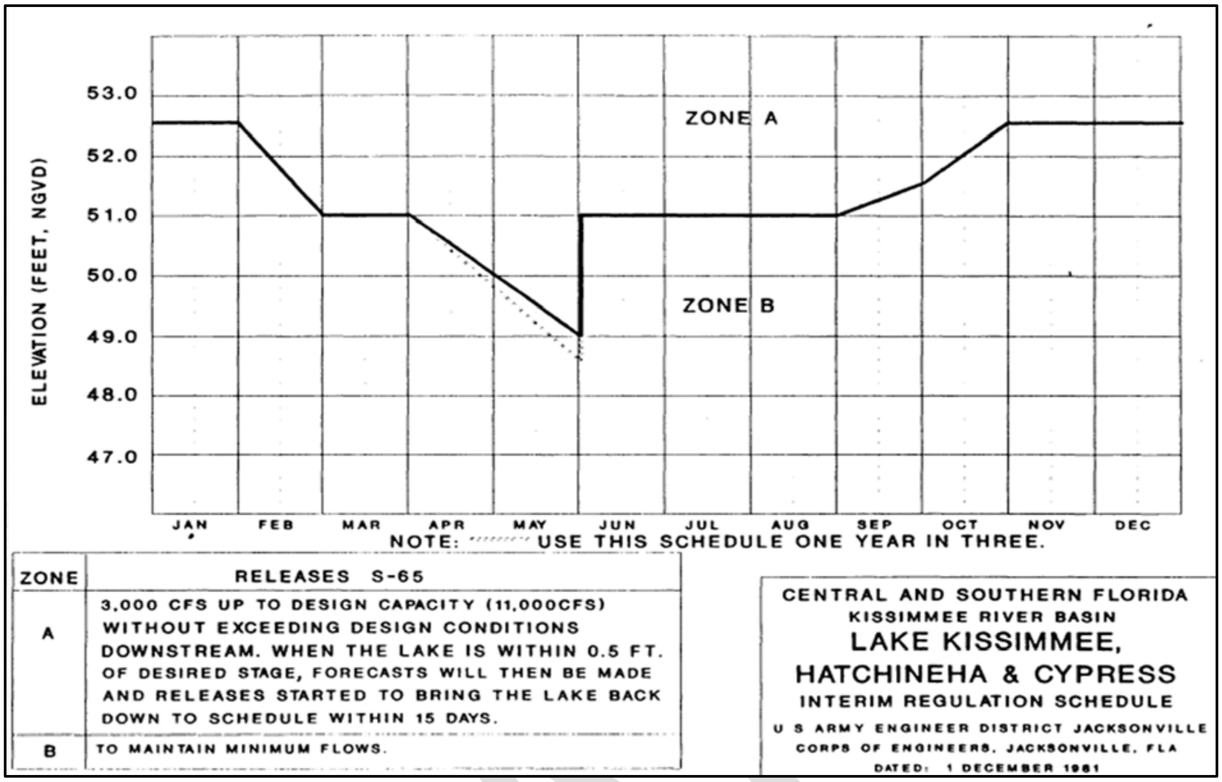

Figure 3-8. Pre-Kissimmee River Restoration Project regulation schedule for Lakes Kissimmee, Cypress, and Hatchineha.

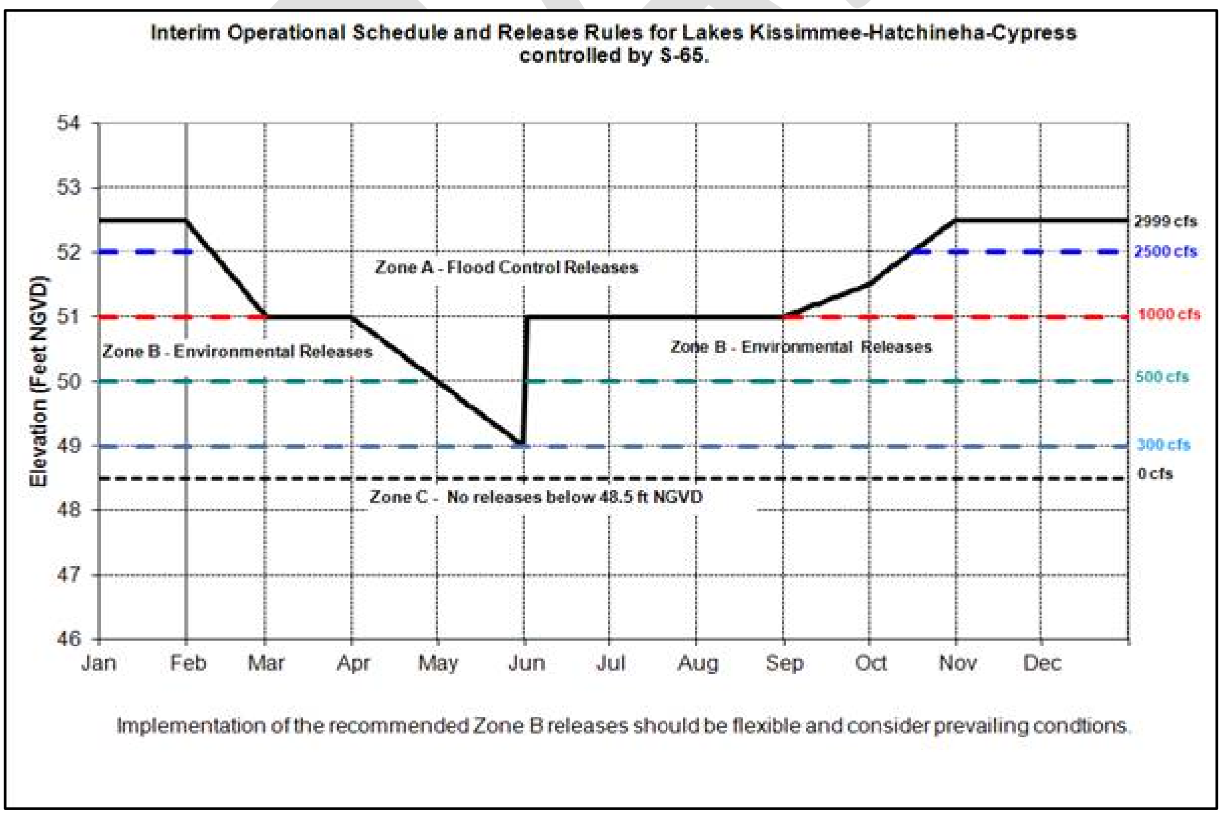

Figure 3-9. Lakes Kissimmee, Cypress, and Hatchineha interim regulation schedule.

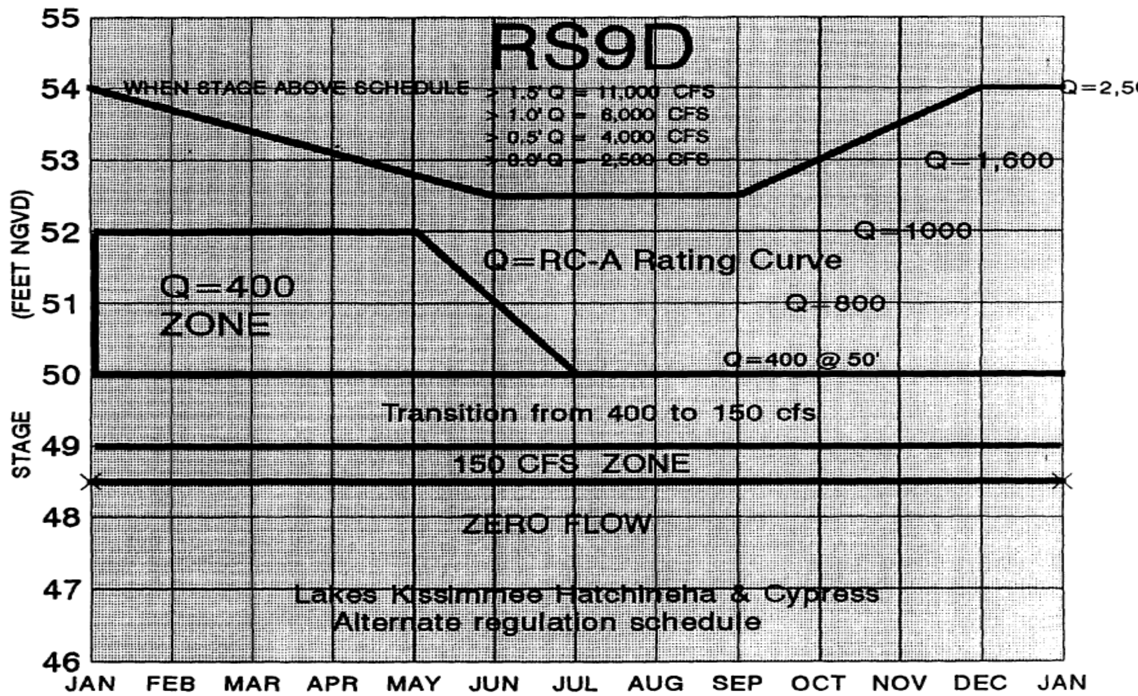

Figure 3-10. Lake Kissimmee, Cypress, and Hatchineha authorized Headwaters Revitalization regulation schedule. Recommended modified regulation schedule for the Kissimmee River Headwaters Revitalization Project (From: United States Army Corps of Engineers 1996).

Figure 3-11 illustrates the KCH regulation schedule as seen by the UK-OPS Model. Up to 10 zones can be defined. The zones are numbered, and the labeled lines represent the bottom of the zone. The various zone lines in **Figure 3-11** represent the operation designed for the 2019 wet season to benefit fish and wildlife resources for KCH and the Kissimmee River. The dashed line (Zone 10) represents a 0.3-foot offset above the Zone A line (Zone 9) that is used to transition flows up to the maximum discharge. The model can simulate a linear transition from zero to maximum discharge in this range, if specified.

The UK-OPS Model uses a zone-discharge function to specify discharge rates within the regulation schedule zones. For KCH (**Figure 3-12**), the function is more complex than for ETO and TOH. As with the other zone-discharge functions, the zone number represents the bottom of the zone. Zero discharge is prescribed for all zones below Zone 3 (elevation 48.5 feet). Within Zone 3, discharge linearly increases with rising stage from 0 to 300 cfs. Zone 4 discharge is to be a constant 300 cfs, Zones 5 to 8 also specify linear variation with stage. Zone 9 transitions the discharge from 3,000 cfs at the top of the schedule (bottom of Zone A) to maximum capacity of 11,000 cfs at the Zone 10 dashed line, which is 0.3 feet above the schedule.

UK-OPS Model users can specify the breakpoints of the KCH regulation schedule and the zone-discharge function by changing the values in the color-coded tables within the KCHops worksheet. The regulation schedule and the zone-discharge function graphics automatically display changes to the inputs to enable verification of the intended changes.

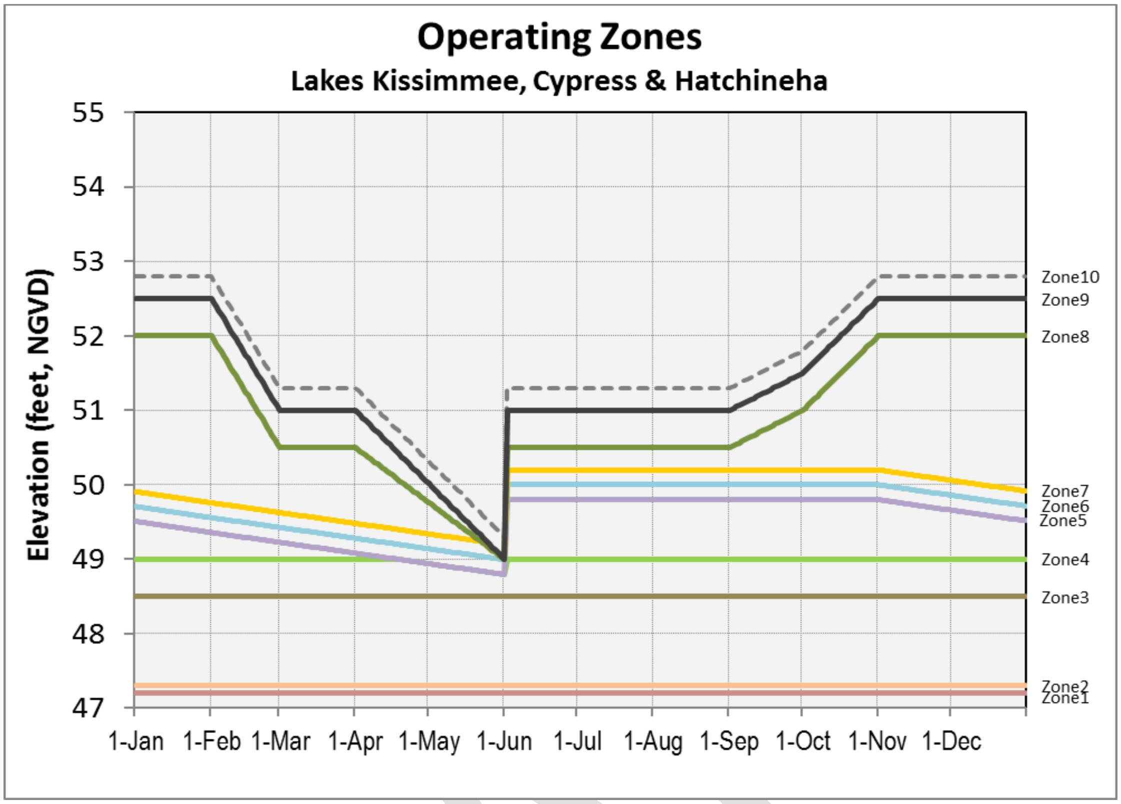

Figure 3-11. Lakes Kissimmee, Cypress, and Hatchineha regulation schedule as seen by the UK-OPS Model.

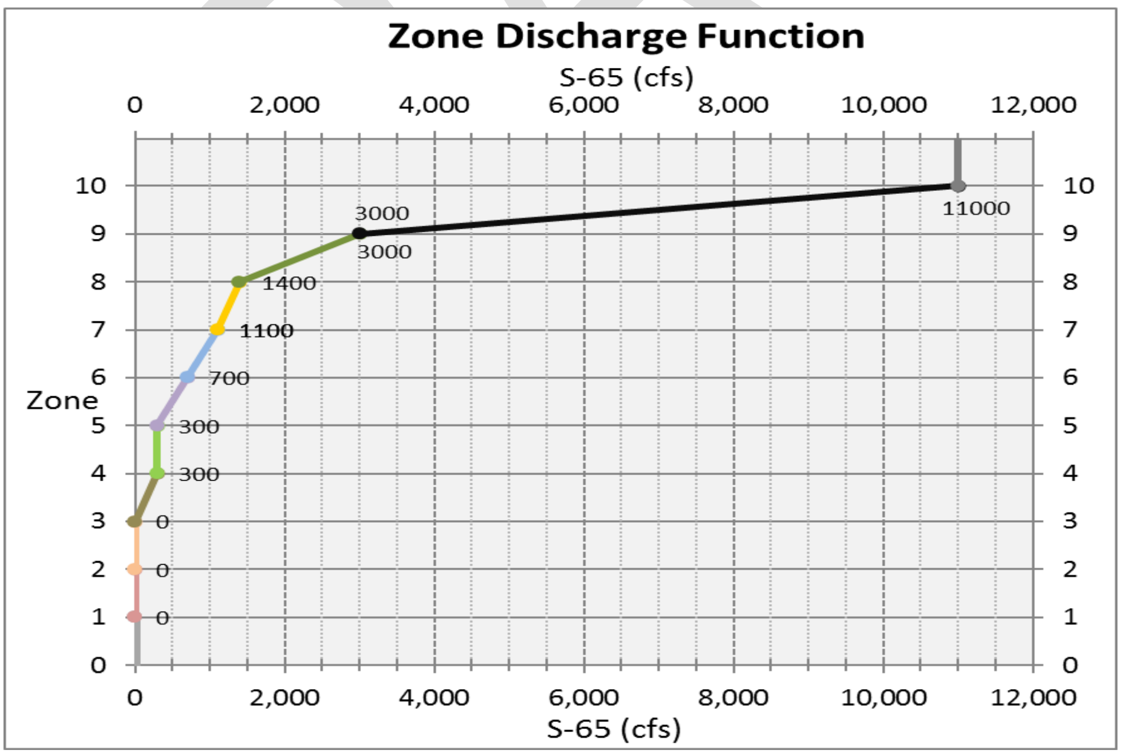

Figure 3-12. Lakes Kissimmee, Cypress, and Hatchineha zone-discharge function used by the UK-OPS Model.

3.4.1 Hydraulic Capacity Assumptions for S-65 and S-65A

The S-65 five-gated spillway is capable of discharging up to 11,000 cfs. The downstream S-65A gated spillway also has a design capacity of 11,000 cfs. However, much of the capacity at S-65A is taken up by basin runoff; therefore, releases at S-65 generally are limited to avoid exceeding S-65A discharge capacity. Additionally, the operating criteria for S-65 provides for a firm capacity of 3,000 cfs. In other words, a minimum of 3,000 cfs must be released at S-65.

The UK-OPS Model uses a time series of basin runoff entering Pool A (the river reach from S-65 to S-65A) to determine the maximum release rates each day of the simulation. The model does not simulate the C-38 Canal stage within Pool A; therefore, even a rudimentary hydraulic discharge calculation, like that used for S-59 and S-61, is not possible. This has not proven to be a limitation of the UK-OPS Model period-of-record simulations because the discharges prescribed by the regulation schedule are almost always less than the 11,000 cfs limit at S-65A. Furthermore, when KCH Zone A releases are required, simulated runoff into the C-38 Canal within Pool A has not been high enough to trigger use of the firm capacity provision. A more detailed hydraulic model like the Mike 11 application for the Kissimmee River (SFWMD 2017) is needed to perform an analysis that involves assessing discharge capacity based on C-38 Canal stage.

4 MODEL STRUCTURE AND ORGANIZATION

4.1 Overview and User Interface

This section presents the structure and organization of the UK-OPS Model Excel® workbook, particularly the various worksheets and general data flow between worksheets. Descriptions of the primary inputs and computational worksheets are provided. The model output worksheets and performance graphics are described in **Section 5**.

Figure 4-1 illustrates the basic model structure and data flow between the worksheets. From the graphical user interface (GUI) worksheet (**Figure 2-3**), the user can specify simulation type, simulation name and description, and one of four output locations (ALT0 to ALT3). Simulations are executed from the GUI worksheet using the Run and Save buttons. The Retrieve button retrieves/loads previous scenario inputs into the worksheets that contain the active operating schedules for each lake system. Then, the inputs can be modified, and a new scenario can be executed. Macros execute the simulation and automatically manage the input and output data.

Clicking on the outlet structure name links on the GUI map transfers control to the corresponding operations worksheet where modifications to the regulation schedules and changes to other operating assumptions can be made (e.g., KCHops). The outlet structure discharge and routing calculations for each lake system are handled in separate worksheets named for each lake system (e.g., KCHsim).

Each lake system has a worksheet for specifying the input operations, and each simulation has a worksheet (ALT0 to ALT3) containing all the outputs as well as a copy of the input parameter values, which can be retrieved from the GUI buttons as noted above. Simulation outputs are automatically accessed by the time-series plots and performance summary graphics. In some cases, the summary graphics have dropdown menus to specify the particular simulation and summary information to display. A single 49-year, daily timestep, simulation executes in less than 4 minutes; thus, results are quickly available for analysis.

4.2 Operations Worksheets for Large Lake Systems

The following discussions focus on the operations-related input data sets used in the UK-OPS Model for the large lake systems. The KCHops, TOHops, and ETOops worksheets contain the operations input for lake systems KCH, TOH, and ETO, respectively. The information and organizational layout are similar among the three worksheets.

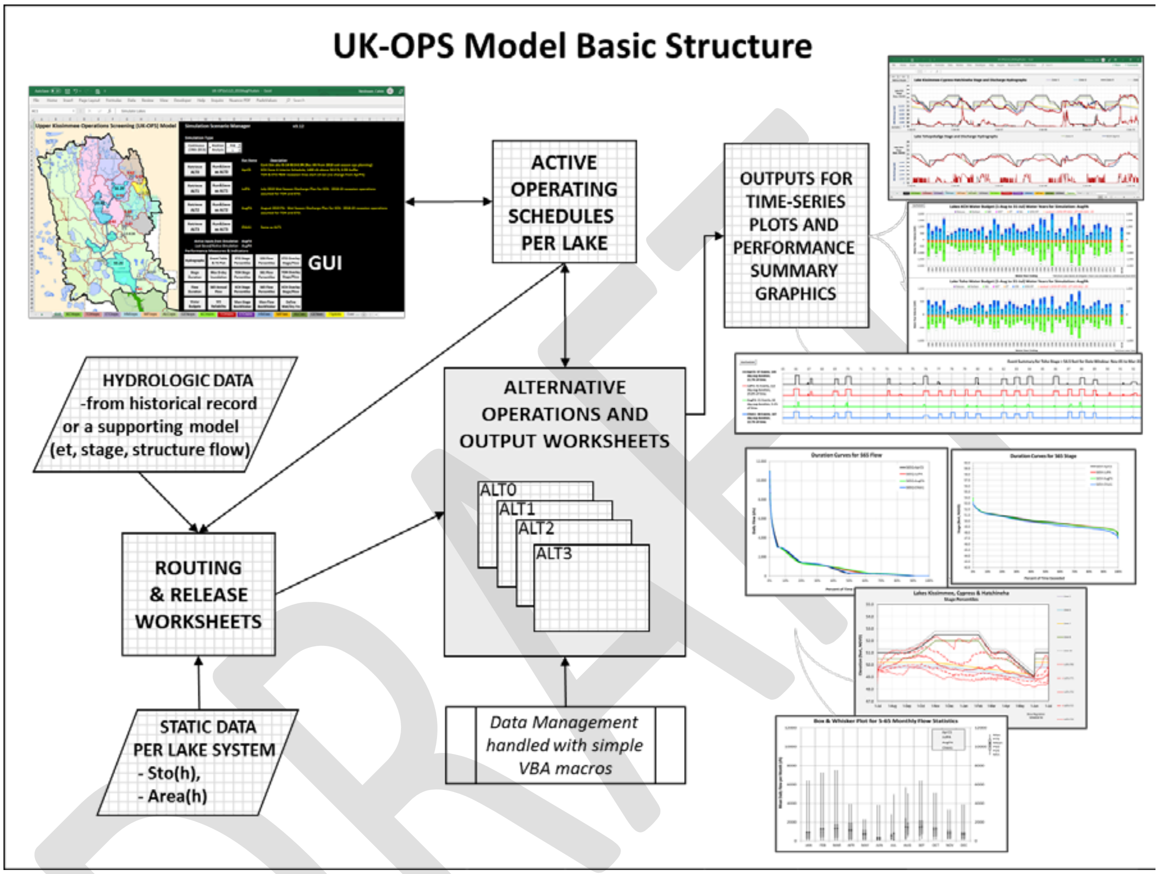

Figure 4-1. UK-OPS Model basic structure and data flow.

4.2.1 KCHops Worksheet

The KCHops worksheet contains operational information for the KCH system simulation. The model user can prescribe how to manage the KCH system by defining its regulation schedule, zone-discharge relationship, and parameters for releasing water to the Kissimmee River. In addition, various switches or flags for available operational features are defined in this worksheet.

The KCHops worksheet also contains copies of breakpoint data for past, present, and future planned KCH regulation schedules. These are located starting in column AP. The active schedule used for the simulation is in the predefined range OpZonesKCH, located in the upper left section of the worksheet in the shaded columns. Users can change the breakpoints as needed to describe the desired schedule. The breakpoints are used to interpolate the daily values of each zone, which are displayed in the Operating Zones chart starting in column N. Similarly, the release rules and limits for describing the zone-discharge function, located under ReleaseRulesKCH, can be modified to reflect desired inputs. The entered breakpoints update the Zone-Discharge Function chart, which represents how the model will view the breakpoint information and serves as a helpful way to ensure the desired input is being used.

The UK-OPS Model has several ways to specify S-65 release rules. These features enable testing alternative operations to improve performance for the river and/or to improve the balance of performance between the river and KCH. The model also allows specification of an alternative regulation schedule to be used for user-specified conditions or for specifically defined years of the simulation. For example, this feature enables testing of periodic lake drawdown operations. Specifications for alternative operations begin in column AA.

Table 4-1 presents the various parameters and options available for testing alternative operations. Further details and tips are provided within the worksheet via mouse-over comments indicated by red triangles in the upper-right corner of pertinent cells.

Table 4-1. Optional UK-OPS Model operations for S-65 and Lakes Kissimmee, Cypress, and Hatchineha.

Parameter	Definition
QoptKCH = 0	Flow values set to inputs for testing routing calculations
QoptKCH = 1	Releases per operating zones and zone-discharge function
QoptKCH = 2	Option 1 with daily change in releases limited by maxDQrise and maxDQfall (**Figure 4-2**)
QoptKCH = 3	Option 2 but releases shift to zone-discharge function at zone boundaries
QoptKCH = 4	Zone B releases per user-specified flow time series Series number specified via parameter QoptS65tarQseries and points to series in the S65targetQseries worksheet
QoptKCH = 5	Releases per maximum of Options 1 and 4
QoptKCH = 6	Releases per user-specified logic in routing worksheet (KCHsim)
OptKCHalt = 1	Use alternative operations when user-specified stage conditions are met
OptKCHalt = 2	Use alternative operations for user-specified years

For QoptKCH values of 2 or 3 (**Table 4-1**), the release rate limits are specified by values shown in **Figure 4-2**. This figure represents a typical function specified to limit release rates at S-65 or S-65A depending on the previous day's discharge rate. Limits can be specified for increasing and decreasing discharge regimes.

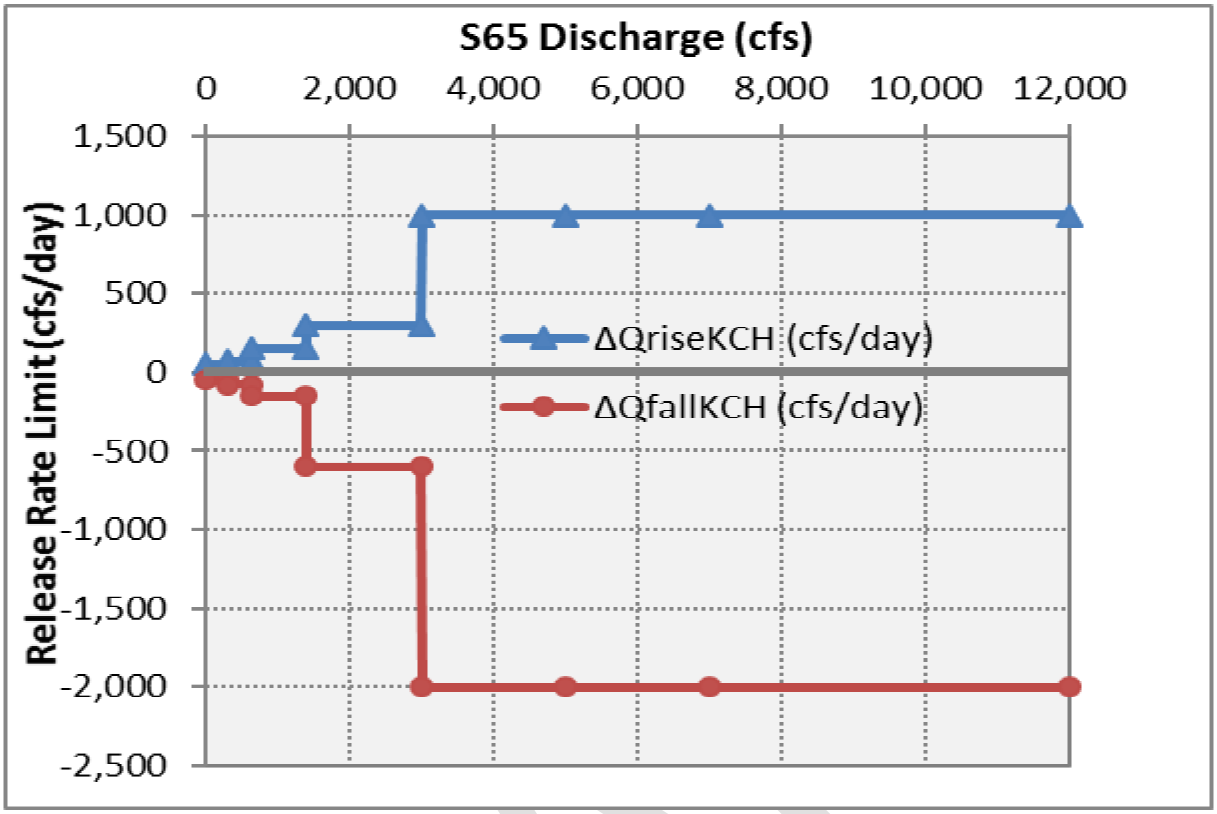

Figure 4-2. Example of S-65 release rate limits for Lakes Kissimmee, Cypress, and Hatchineha.

4.2.2 TOHops Worksheet

The TOHops worksheet contains operational information for the TOH system simulation. The model user can prescribe how to manage TOH by defining its regulation schedule, zone-discharge relationship, and other parameters. In addition, various switches or flags for available operational features are defined in this worksheet.

The TOHops worksheet contains breakpoint data for several alternative regulation schedules that have been tested or actually used for TOH. These are located starting in column AA. The active schedule used for the simulation is in the predefined range OpZonesTOH, located in the upper left section of the worksheet in the shaded columns. Users can change the breakpoints as needed to describe the desired schedule. The breakpoints are used to interpolate the daily values of each zone and are displayed in the Operating Zones chart starting in column J. Similarly, the release rules and limits for describing the zone-discharge function, located in ReleaseRulesTOH, can be modified to reflect desired inputs. The breakpoints entered update the Zone-Discharge Function chart, which represents how the model will view the breakpoint information and serves as a helpful way to ensure the desired input is being used.

Other inputs in the TOHops worksheet include water supply withdrawal parameters, which enable testing user-specified withdrawals subject to the draft KRCOL Water Reservation rules. Switches are available that require up to three conditions to be satisfied before the simulated withdrawal is made.

Table 4-2 presents the various parameters and options available for testing alternative operations. Further details and tips are provided within the worksheet via mouse-over comments indicated by red triangles in the upper-right corner of pertinent cells.

Table 4-2. Optional UK-OPS Model operations for S-61 and Lake Tohopekaliga.

Parameter	Definition
QoptTOH = 0	Flow values set to inputs for testing routing calculations
QoptTOH = 1	Releases per operating zones and zone-discharge function
QoptTOH = 2	Same as Option 1, but gravity releases are supplemented with pumping when the spillway capacity is less than the target release
QoptTOH = 3	Constant 200 cubic feet per second release (placeholder for future option and code)
QoptTOH = 4	Releases per user-specified logic in routing worksheet (TOHsim)

4.2.3 ETOops Worksheet

The ETOops worksheet contains operational information for the ETO system simulation. The model user can prescribe how to manage ETO by defining its regulation schedule, zone-discharge relationship, and other parameters. In addition, various switches or flags for available operational features are defined in this worksheet.

The ETOops worksheet contains breakpoint data for several alternative regulation schedules that have been tested or actually used for ETO. These are located starting in column AA. The active schedule used for the simulation is in the predefined range OpZonesETO, located in the upper left section of the worksheet in the shaded columns. Users can change the breakpoints as needed to describe the desired schedule. The breakpoints are used to interpolate the daily values of each zone and are displayed in the Operating Zones chart starting in column J. Similarly, the release rules and limits for describing the zone-discharge function, located in ReleaseRulesETO, can be modified to reflect desired inputs. The entered breakpoints update the Zone-Discharge Function chart, which represents how the model will view the breakpoint information and serves as a helpful way to ensure the desired input is being used.

Other inputs in the ETOops worksheet include water supply withdrawal parameters, which enable testing user-specified withdrawals subject to the draft KRCOL Water Reservation rules. Switches are available that require up to three conditions to be satisfied before the simulated withdrawal is made.

Table 4-3 presents the various parameters and options available for testing alternative operations. Further details and tips are provided within the worksheet via mouse-over comments indicated by red triangles in the upper-right corner of pertinent cells.

Table 4-3. Optional UK-OPS Model operations for S-59 and East Lake Tohopekaliga.

Parameter	Definition
QoptETO = 0	Flow values set to inputs for testing routing calculations
QoptETO = 1	Releases per operating zones and zone-discharge function
QoptETO = 2	Same as Option 1, but gravity releases are supplemented with pumping when the spillway capacity is less than the target release
QoptETO = 3	Constant 200 cubic feet per second release (placeholder for future option and code)
QoptETO = 4	Releases per user-specified logic in routing worksheet (ETOsim)

4.3 Operations Worksheets for Small Lake Systems

This section describes the operations-related input data sets used in the UK-OPS Model for the small lake systems. The HMJops, MPJops, ALCops, and GENops worksheets contain the operations input for lake systems HMJ, MPJ, ALC, and GEN, respectively. The information and organizational layout are similar among the four worksheets. There is no routing of inflows and outflows through the small lake systems in the current configuration of the UK-OPS Model. Boundary inflows are defined in the WNI calculation, as described in **Sections 2.2** to **2.5**. The small lakes are included only to test water supply withdrawal scenarios subject to the draft KRCOL Water Reservation rules. As described in **Section 2.5**, withdrawals from the small lakes are simulated as withdrawals from the next downstream large lake system.

4.3.1 HMJops Worksheet

The HMJops worksheet contains operational information for simulating the HMJ system. The modeled operational information is limited to specification of the WRL. Various switches or flags for available KRCOL Water Reservation criteria also are defined in this worksheet.

The HMJ regulation schedule is in the predefined range OpZonesHMJ, located in the upper left section of the worksheet in the shaded columns. Users can change the breakpoints of the schedule, but it has no bearing on the simulation; only changes to the WRL can affect the simulation. The WRL, along with other draft KRCOL Water Reservation rule criteria, determine when water supply withdrawals can occur.

The UK-OPS Model has five optional conditions in the HMJops worksheet that can be evaluated to determine if water supply withdrawals can occur:

1. HMJ stage above its WRL?
2. ETO stage above its WRL?
3. TOH stage above its WRL?
4. KCH stage above its WRL?
5. Lake Okeechobee discharging excess water to tide?

Typically, conditions 1 and 2 or conditions 1, 2, and 5 are set to TRUE to determine when the prescribed HMJ withdrawal capacity can be taken. Withdrawals can occur if the HMJ and ETO stages are above their respective WRLs and the other draft KRCOL Water Reservation rule criteria are met. Recognizing the withdrawal may reduce lake outflow and affect the downstream large lake system, the UK-OPS Model assumes the withdrawal is directly from the downstream large lake system, ETO in this instance.

4.3.2 MPJops Worksheet

The MPJops worksheet contains operational information for simulating the MPJ system. The modeled operational information is limited to specification of the WRL. Various switches or flags for available KRCOL Water Reservation criteria also are defined in this worksheet.

The MPJ regulation schedule is in the predefined range OpZonesMPJ, located in the upper left section of the worksheet in the shaded columns. Users can change the breakpoints of the schedule, but it has no bearing on the simulation; only changes to the WRL can affect the simulation. The WRL, along with other proposed KRCOL Water Reservation criteria, determines when water supply withdrawals can occur.

The UK-OPS Model has six optional conditions in the MPJops worksheet that can be evaluated to determine if water supply withdrawals can occur:

1. MPJ stage above its WRL?
2. HMJ stage above its WRL?
3. ETO stage above its WRL?
4. TOH stage above its WRL?
5. KCH stage above its WRL?
6. Lake Okeechobee discharging excess water to tide?

Typically, conditions 1, 2, and 3 or conditions 1, 2, 3, and 5 are set to TRUE to determine when the prescribed MPJ withdrawal capacity can be taken. Withdrawals can occur if the MPJ, HMJ, and ETO stages are above their respective WRLs and the other draft KRCOL Water Reservation rule criteria are met. Recognizing the withdrawal may reduce lake outflow and affect the downstream large lake system, the UK-OPS Model assumes the withdrawal is directly from the downstream large lake system, ETO in this instance.

4.3.3 ALCops Worksheet

The ALCops worksheet contains operational information for simulating the ALC system. The modeled operational information is limited to specification of the WRL. Various switches or flags for available KRCOL Water Reservation criteria also are defined in this worksheet.

The ALC regulation schedule is in the predefined range OpZonesALC, located in the upper left section of the worksheet in the shaded columns. Users can change the breakpoints of the schedule, but it has no bearing on the simulation; only changes to the WRL can affect the simulation. The WRL, along with other draft KRCOL Water Reservation criteria, determines when water supply withdrawals can occur.

The UK-OPS Model has four optional conditions in the ALCops worksheet that can be evaluated to determine if water supply withdrawals can occur:

1. ALC stage above its WRL?
2. GEN stage above its WRL?
3. KCH stage above its WRL?
4. Lake Okeechobee discharging excess water to tide?

Typically, conditions 1, 2, and 3 or all four conditions are set to TRUE to determine when the prescribed ALC withdrawal capacity can be taken. Withdrawals can occur if the ALC, GEN, and KCH stages are above their respective WRLs and the other draft KRCOL Water Reservation rule criteria are met. Recognizing the withdrawal may reduce lake outflow and affect the downstream large lake system, the UK-OPS Model assumes the withdrawal is directly from the downstream large lake system, KCH in this instance.

4.3.4 GENops Worksheet

The GENops worksheet contains operational information for simulating the GEN system. The modeled operational information is limited to specification of the WRL. Various switches or flags for available KRCOL Water Reservation criteria also are defined in this worksheet.

The GEN regulation schedule is in the predefined range OpZonesGEN, located in the upper left section of the worksheet in the shaded columns. Users can change the breakpoints of the schedule, but it has no bearing

on the simulation; only changes to the WRL can affect the simulation. The WRL, along with other draft KRCOL Water Reservation criteria, determines when water supply withdrawals can occur.

The UK-OPS Model has three optional conditions in the GENops worksheet that can be evaluated to determine if water supply withdrawals can occur:

1. GEN stage above its WRL?
2. KCH stage above its WRL?
3. Lake Okeechobee discharging excess water to tide?

Typically, conditions 1 and 2 or all three conditions are set to TRUE to determine when the prescribed GEN withdrawal capacity can be taken. Withdrawals can occur if the GEN and KCH stages are above their respective WRLs and the other draft KRCOL Water Reservation rule criteria are met. Recognizing the withdrawal may reduce lake outflow and affect the downstream large lake system, the UK-OPS Model assumes the withdrawal is directly from the downstream large lake system, KCH in this instance.

4.4 Routing Worksheets for Large Lake Systems

This section describes the routing worksheets for the three large lake systems simulated by the UK-OPS Model. Most simulation calculations occur in the routing sheets using traditional Microsoft Excel® formulas. Routing calculations are not handled by Visual Basic for Applications (VBA) program code via Microsoft Excel® macros. Macros are used by the model but primarily to manage the data. The ETOsim, TOHsim, and KCHsim worksheets contain calculations for determining releases and stages for lake systems ETO, TOH, and KCH, respectively. The information and organizational layout are similar among the three routing worksheets. To best understand the worksheets, readers should have the UK-OPS Model workbook open to follow along with the descriptions.

4.4.1 ETOsim Worksheet

The ETOsim worksheet performs the primary simulation for the ETO system. The worksheet contains: 1) the daily timestep computations for processing boundary conditions, namely WNI+RF; 2) calculations of lake outflows and stages using user-prescribed operating rules; and 3) processing of several metrics of performance, which are used to automatically update the output performance measures and charts (refer to **Section 5**).

4.4.1.1 Boundary Conditions

Calculations for computing the WNI+RF boundary series are contained in columns B through K of the ETOsim worksheet. **Equation 2.2.2** was derived for WNI+RF (**Section 2.2**) and is computed in column K. Because WNI+RF is a persistent time series, it only needs to be calculated once. The shaded cells in the worksheet have formulas, whereas the unshaded cells (starting in row 18) contain only values. If input hydrology data values change, then the ETO_ResetInputData macro (button near cell E4) must be executed to recalculate the WNI+RF values.

4.4.1.2 Routing

Simulation calculations for ETO stages and S-59 discharges begin in column L of the ETOsim worksheet. The fundamental routing equation (**Equation 2.2.1**) used was presented in **Section 2.2**. The calculation uses the beginning-of-day stage, storage, and area for calculating ET volume (column T) and structure discharge (column AK). Water supply withdrawals, if any, are totaled in column AT. Storage change,

end-of-day storage, and stage are computed in columns AU through AX. The end-of-day values become the beginning-of-day values for the next day. Calculations proceed for each day of the simulation.

When the simulation is executed, the ETO_Expand_Formulas macro expands the routing formulas starting January 7, 1965 (row 17) for all the simulation days. Then the execution runs the ETO_Formulas2Values macro to save the computed formulas as values for further processing. This procedure saves workbook space and computational resources. Buttons at the top of column T are available to execute the macros (e.g., if needed for testing), independent of the simulation execution.

4.4.1.3 Summary Statistics

After routing is completed, the UK-OPS Model processes the simulation output in many different forms. Daily stage and flow tables are automatically updated via the RunSaveETOStgStats and RunSaveS59FlowStats macros, respectively. The stage tables are within worksheet range BD7 through DK393, and the flow tables are within worksheet range BD407 through BK793. Water budget calculations are within workbook range DO8 through EF62. Water supply reliability calculations are within workbook range EI8 through EY17907.

4.4.2 TOHsim Worksheet

The TOHsim worksheet performs the primary simulation for the TOH system. The worksheet contains: 1) the daily timestep computations for processing boundary conditions, namely WNI+RF; 2) calculations of lake outflows and stages using user-prescribed operating rules; and 3) processing of several metrics of performance, which are used to automatically update the output performance measures and charts (refer to **Section 5**).

4.4.2.1 Boundary Conditions

Calculations for computing the WNI+RF boundary series are contained in columns B through K of the TOHsim worksheet. **Equation 2.3.2** was derived for WNI+RF (**Section 2.3**) and is computed in column K. Because WNI+RF is a persistent time series, it only needs to be calculated once. The shaded cells in the worksheet have formulas, whereas the unshaded cells (starting in row 18) contain only values. If input hydrology data values change, then the TOH_ResetInputData macro (button near cell E4) must be executed to recalculate the WNI+RF values.

4.4.2.2 Routing

Simulation calculations for TOH stages and S-61 discharges begin in column L of the TOHsim worksheet. The fundamental routing equation (**Equation 2.3.1**) was presented in **Section 2.3**. The calculation uses the beginning-of-day stage, storage, and area for calculating ET volume (column T) and structure discharge (column AK). Water supply withdrawals, if any, are evaluated in column AP. Storage change, end-of-day storage, and stage are computed in columns AQ through AT. The end-of-day values become the beginning-of-day values for the next day. Calculations proceed for each day of the simulation.

When the simulation is executed, the TOH_Expand_Formulas macro expands the routing formulas starting January 7, 1965 (row 17) for all the simulation days. Then the execution runs the TOH_Formulas2Values macro to save the computed formulas as values for further processing. This procedure saves workbook space and computational resources. Buttons located at the top of column T are available to execute the macros (e.g., if needed for testing), independent of the simulation execution.

4.4.2.3 Summary Statistics

After routing is completed, the UK-OPS Model processes the simulation output in many different forms. Daily stage and flow tables are automatically updated via the RunSaveTOHStgStats and RunSaveS61FlowStats macros, respectively. The stage tables are within worksheet range BD7 through DK393, and the flow tables are within worksheet range BD407 through BK793. Water budget calculations are within workbook range DO8 through EF62. Water supply reliability calculations are within workbook range EI8 through EY17907.

4.4.3 KCHsim Worksheet

The KCHsim worksheet performs the primary simulation for the KCH system. The worksheet contains: 1) the daily timestep computations for processing boundary conditions, namely WNI+RF; 2) calculations of lake outflows and stages using user-prescribed operating rules; and 3) processing of several metrics of performance, which are used to automatically update the output performance measures and charts (refer to **Section 5**).

4.4.3.1 Boundary Conditions

Calculations for computing the WNI+RF boundary series are contained in columns B through K of the KCHsim worksheet. **Equation 2.4.2** was derived for WNI+RF (**Section 2.4**) and is computed in column K. Because WNI+RF is a persistent time series, it only needs to be calculated once. The shaded cells in the worksheet have formulas, whereas the unshaded cells (starting in row 18) contain only values. If input hydrology data values change, then the KCH_ResetInputData macro (button near cell E4) must be executed to recalculate the WNI+RF values.

4.4.3.2 Routing

Simulation calculations for KCH stages as well as S-65 and S-65A discharges begin in column M of the KCHsim worksheet. The fundamental routing equation (**Equation 2.4.1**) was presented in **Section 2.4**. The calculation uses the beginning-of-day stage, storage, and area for calculating ET volume (column T) and structure discharge (columns AU and AV). Water supply withdrawals, if any, are totaled in column AY. Storage change, end-of-day storage, and stage are computed in columns AZ through BC. The end-of-day values become the beginning-of-day values for the next day. Calculations proceed for each day of the simulation.

When the simulation is executed, the KCH_Expand_Formulas macro expands the routing formulas starting January 7, 1965 (row 17) for all the simulation days. Then the execution runs the KCH_Formulas2Values macro to save the computed formulas as values for further processing. This procedure saves workbook space and computational resources. Buttons located at the top of column T are available to execute the macros (e.g., if needed for testing), independent of the simulation execution.

4.4.3.3 Summary Statistics

After routing is completed, the UK-OPS Model processes the simulation output in many different forms. Daily stage tables are automatically updated via the RunSaveKCHStgStats macro, and daily flow tables for S-65 and S-65A are automatically updated via the RunSaveS65FlowStats and RunSaveS65AFlowStats macros, respectively. The stage tables are within worksheet range BG7 through DN393, and the flow tables for S-65 and S-65A are within worksheet ranges BG407 through DN793 and BG807 through DN1193, respectively. Water budget calculations are within workbook range DR8 through EI62. There are no water supply reliability calculations in the UK-OPS Model for the KCH system because the draft KRCOL Water Reservation rules do not permit withdrawals from this lake system.

4.5 Water Supply Worksheets for Small Lake Systems

This section describes the water supply worksheets for the four small lake systems simulated by the UK-OPS Model. As previously mentioned, routing currently is not simulated for the small lake systems in the UK-OPS Model. The small lake systems are used only to determine the timing and volume of potential water supply withdrawals subject to the proposed KRCOL Water Reservation rule constraints. The HMJws, MPJws, ALCws, and GENws worksheets contain calculations for simulating water supply withdrawals from lake systems HMJ, MPJ, ALC, and GEN, respectively. The information and organizational layout are similar among the four worksheets. To best understand the worksheets, readers should have the UK-OPS Model workbook open to follow along with the descriptions.

4.5.1 HMJws Worksheet

The HMJws worksheet determines if user-prescribed water supply withdrawals can be made from the HMJ lake system. The worksheet is much simpler and smaller than the routing worksheets for the large lake systems. The HMJws worksheet: 1) contains the daily timestep computations that compare the HMJ input stages and stages in the downstream lakes with their respective WRLs; and 2) processes the number of days per month that water supply withdrawals were simulated.

Withdrawals allowed from the HMJ system are simulated as withdrawals from the next downstream large lake system, ETO in this instance. The assumption is that withdrawals from HMJ would reduce inflows to ETO, thus the model makes the withdrawal, subject to constraints, from ETO.

To save computation resources, this worksheet expands the formulas for the simulation period to make the necessary computations, then saves the formulas as values. The HMJ_Expand_Formulas and HMJ_Formulas2Values macros are executed automatically during a simulation. Buttons in column R can run the macros independent of the simulation for testing.

4.5.2 MJPws Worksheet

The MPJws worksheet determines if user-prescribed water supply withdrawals can be made from the MPJ lake system. The worksheet is much simpler and smaller than the routing worksheets for the large lake systems. The MPJws worksheet: 1) contains the daily timestep computations that compare the MPJ input stages and stages in the downstream lakes with their respective WRLs; and 2) processes the number of days per month that water supply withdrawals were simulated.

Withdrawals allowed from the MPJ system are simulated as withdrawals from the next downstream large lake system, ETO in this instance. The assumption is that withdrawals from MPJ would reduce inflows to ETO, thus the model makes the withdrawal, subject to constraints, from ETO.

To save computation resources, this worksheet expands the formulas for the simulation period to make the necessary computations, then saves the formulas as values. The MPJ_Expand_Formulas and MPJ_Formulas2Values macros are executed automatically during a simulation. Buttons in column R can run the macros independent of the simulation for testing.

4.5.3 ALCws Worksheet

The ALCws worksheet determines if user-prescribed water supply withdrawals can be made from the ALC lake system. The worksheet is much simpler and smaller than the routing worksheets for the large lake systems. The ALCws worksheet: 1) contains the daily timestep computations that compare the ALC input stages and stages in the downstream lakes with their respective WRLs; and 2) processes the number of days per month that water supply withdrawals were simulated.

Withdrawals allowed from the ALC system are simulated as withdrawals from the next downstream large lake system, KCH in this instance. The assumption is that withdrawals from ALC would reduce inflows to KCH, thus the model makes the withdrawal, subject to constraints, from KCH.

To save computation resources, this worksheet expands the formulas for the simulation period to make the necessary computations, then saves the formulas as values. The ALC_Expand_Formulas and ALC_Formulas2Values macros are executed automatically during a simulation. Buttons in column R can run the macros independent of the simulation for testing.

4.5.4 GENws Worksheet

The GENws worksheet determines if user-prescribed water supply withdrawals can be made from the GEN lake system. The worksheet is much simpler and smaller than the routing worksheets for the large lake systems. The GENws worksheet: 1) contains the daily timestep computations that compare the GEN input stages and stages in the downstream lakes with their respective WRLs; and 2) processes the number of days per month that water supply withdrawals were simulated.

Withdrawals allowed from the GEN system are simulated as withdrawals from the next downstream large lake system, KCH in this instance. The assumption is that withdrawals from GEN would reduce inflows to KCH, thus the model makes the withdrawal, subject to constraints, from KCH.

To save computation resources, this worksheet expands the formulas for the simulation period to make the necessary computations, then saves the formulas as values. The GEN_Expand_Formulas and GEN_Formulas2Values macros are executed automatically during a simulation. Buttons in column R can run the macros independent of the simulation for testing.

4.6 Other Input Worksheets

The remaining input worksheets for the UK-OPS Model are described in this section. The following input worksheets contain the various time-series input data generated by the more detailed hydrologic models: DATAforUKOPS, UKISSforUKOPS, and AFETforUKOPS. As mentioned in **Section 1**, the UK-OPS Model does not simulate the rainfall-runoff hydrologic process. Instead, it computes watershed inflows to each lake using key hydrologic information from detailed hydrologic models or the historical record.

Other UK-OPS Model input worksheets include S65TargetQseries, which provides flow targets for optional use with KCH operations, and StageStoArea, which contains the static data representing the geometric, or stage-area and stage-storage, relationships used for the routing computations.

4.6.1 DATAforUKOPS Worksheet

The DATAforUKOPS worksheet contains historical lake stage and structure flow data for optional use in computing the boundary condition inflows (WNI+RF), as defined in **Section 2** and calculated in the routing worksheets (**Section 4.4**).

The DATAforUKOPS worksheet is a product of two separate Microsoft Excel® workbooks used to assemble various stage and discharge data sets and to estimate missing values: DataPrepForUKOPSmodel.xlsx and StructureQHWTW_DBHydro_AFET-LT(CN18Aug2015).xlsx. Using the historical data in this worksheet as the basis for the boundary conditions has the advantage of not relying on a particular model for the rainfall-runoff simulation. To evaluate the effects of proposed water withdrawals on the draft KRCOL Water Reservation rules, historical data for a specific 41-year period (1965 to 2005) are specified. This establishes a fixed data set and period that will not change over time.

4.6.2 UKISSforUKOPS Worksheet

The UKISSforUKOPS worksheet contains simulated lake stage and structure flow data for optional use in computing the boundary condition inflows (WNI+RF), as defined in **Section 2** and calculated in the routing worksheets (**Section 4.4**). The UKISSforUKOPS worksheet contains the output from the Upper Kissimmee Chain of Lakes Routing Model (UKISS) (Fan 1986). Specific UKISS output files are referenced in the worksheet. Using these data to compute the boundary conditions implicitly uses the rainfall-runoff methods and other assumptions of UKISS. UKISS was the only regional hydrologic and water management model for the basin in the 1980s and 1990s. Several models have been developed in the past 20 years that have replaced UKISS, the most recent being the Regional Simulation Model – Basins Model (VanZee 2011).

4.6.3 AFETforUKOPS Worksheet

The AFETforUKOPS worksheet contains simulated lake stage and structure flow data for optional use in computing the boundary condition inflows (WNI+RF), as defined in **Section 2** and calculated in the routing worksheets (**Section 4.4**). The AFETforUKOPS worksheet contains output from the Alternative Formulation and Evaluation Tool (AFET), an application of the Mike 11/Mike SHE Model to the Kissimmee Basin (SFWMD 2009, 2017). Specific AFET output files are referenced in the worksheet. Using these data to compute the boundary conditions implicitly uses the rainfall-runoff methods and other assumptions of AFET and Mike 11/Mike SHE. AFET was developed by the SFWMD with assistance from the Architectural and Engineering Company (AECOM) and the Danish Hydraulic Institute (DHI) in support of the Kissimmee Basin Modeling and Operations Study (KBMOS), which ended prematurely in 2013. The modeling tools were further refined by the SFWMD in 2016 to 2018.

4.6.4 S65TargetQSeries Worksheet

The UK-OPS Model has an option to use a target flow time series at S-65 or S-65A for environmental flows to the Kissimmee River. This concept is similar to the Everglades' Shark River Slough Rainfall Plan and the Tamiami Trail Flow Formula for delivering target environmental flows. Up to 11 series can be input in the S65TargetQSeries worksheet. Currently, this worksheet contains only one input series, RDTSv5r, which mimics the pre-channelization rainfall-runoff response of the UKB. Development of this series is a separate topic.

4.6.5 StageStoArea Worksheet

The StageStoArea worksheet contains stage-storage and stage-area information for the three large lake systems: KCH, TOH, and ETO. The data used for these relationships (**Figure 4-3**) came from the development work done by Ken Konyha of the SFWMD when AFET was being developed in 2007. The stage-storage relationship is used with the daily routing to relate storage to stage. The stage-area relationship is used to compute lake surface areas to calculate corresponding ET volumes.

Although small lakes are not included in the StageStoArea worksheet (or in **Figure 4-3**), it should be noted that the large lakes represent 86% of the total storage capacity and total surface area of all managed lakes in the UKB at winter pool stages.

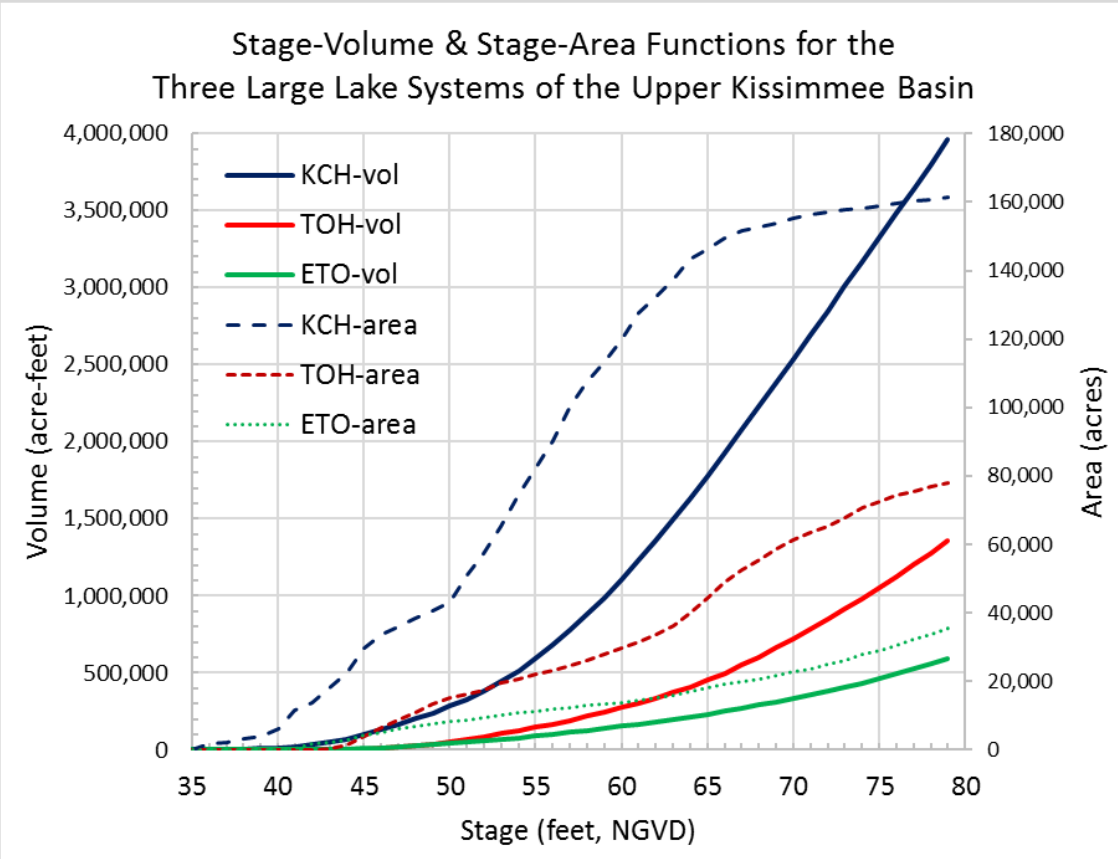

Figure 4-3. Stage-volume and stage-area relationships used by the UK-OPS Model.

5 MODEL OUTPUT

The UK-OPS Model outputs daily time series of stages and releases from the UKB's three largest lake systems into the user-specified ALT0, ALT1, ALT2, and ALT3 worksheets. The model also automatically generates graphical and tabular summaries of simulated performance for evaluating current or proposed operations and/or water supply withdrawal scenarios. These summaries access the pertinent outputs from the ALT worksheets and can be accessed via the buttons on the lower-right portion of the GUI (**Figure 2-3**). This section describes the specific outputs available in the current version of the model.

5.1 Measures of Performance

Simulation model outputs can be summarized in many ways. Traditional outputs include hydrographs (time-series plots of stage and/or flow), water budgets, and various statistical summaries of stage and flow critical to analysts and/or stakeholders. The term "performance measure" has a specific definition for hydrologic simulation modeling analysis in Central and South Florida. Performance measures are quantitative indicators of how well (or poorly) a simulation scenario meets a specific objective. They are a means to make relative comparisons among different test scenarios. Characteristics of a good performance measure are that it

- is quantifiable,
- has a specific target,
- indicates when that target has been reached, and/or
- measures the degree of improvement towards the target when the target has not been reached.

Performance measures are a special class of model outputs that enable a more conclusive interpretation of the simulations. Most UK-OPS Model outputs do not meet this definition of a performance measure. Rather, the UK-OPS Model outputs are better classified as performance indicators, or more generically, measures of performance. These do not have specific targets but are useful for making relative comparisons among alternative scenarios.

The UK-OPS Model output summary measures are hydrologic in nature, and many are considered ecological surrogates (e.g., S-65 annual average flow has a specific limit tied to the ecological health of the Kissimmee River). The UK-OPS Model automatically generates more than 20 output summary measures, classified into two groups: 1) daily stage and flow displays, and 2) hydrologic performance summaries.

5.2 Daily Stage and Flow Displays

The fundamental outputs from a hydrologic simulation model are flows and stages, commonly displayed using hydrographs. Typically, stage and flow series also are displayed as duration curves and percentile plots, which indicate the data distribution. These displays are produced by the UK-OPS Model and are described below.

5.2.1 Hydrographs

The TSplots worksheet can be accessed using the Hydrographs button. The worksheet contains stage and outflow hydrographs for the UKB's three large lake systems and have been very useful for detailed analyses. **Figure 5-1** is an example worksheet showing KCH and TOH. The plots have options to turn on/off particular simulations and regulation schedules. The slider bar enables viewing the entire plot, which also can be scaled to a specified time window. The hydrographs are aligned for easy comparison of the timing and magnitude of the stages and flows between the lakes.

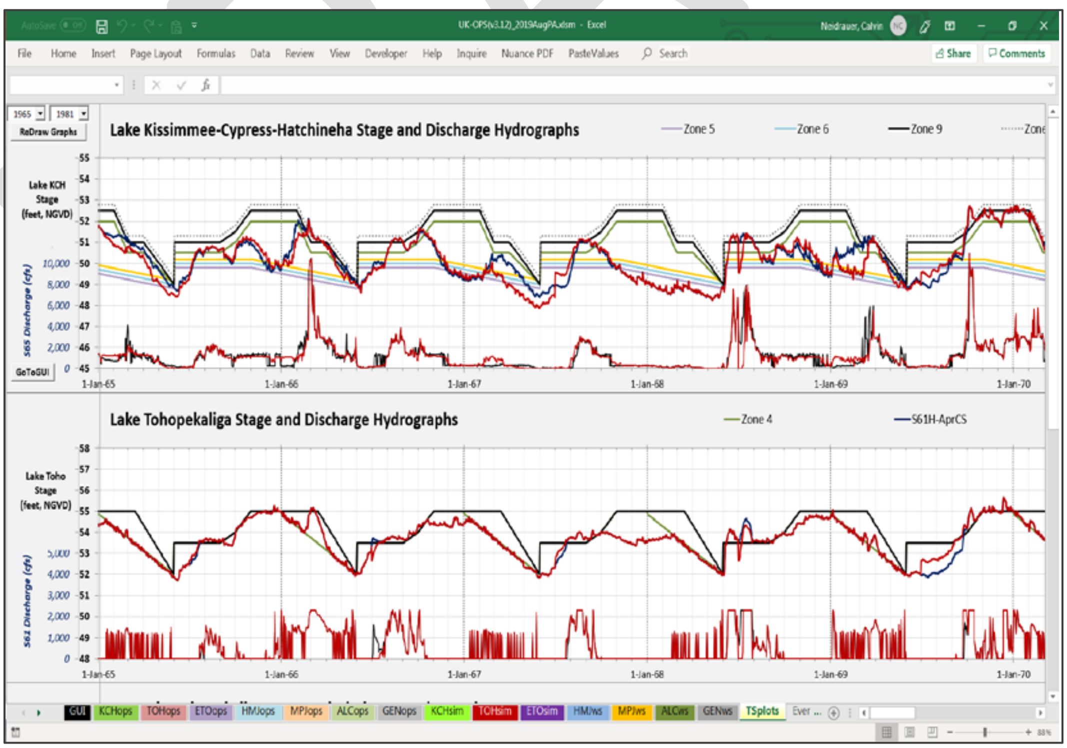

Figure 5-1. Sample stage and discharge hydrographs for Lakes Kissimmee, Cypress, and Hatchineha (top) and Lake Tohopekaliga (bottom).

5.2.2 Stage and Flow Duration

The StageDur and FlowDur worksheets can be accessed using the Stage Duration and Flow Duration buttons, respectively. Duration curves display the sorted output series, similar to a cumulative probability distribution function. The duration curves show the data range and indicate the value distribution. **Figures 5-2** and **5-3** are example stage and duration curves for KCH and S-65, respectively. The plots include options to select one of the three large lake systems and to turn on/off particular simulations.

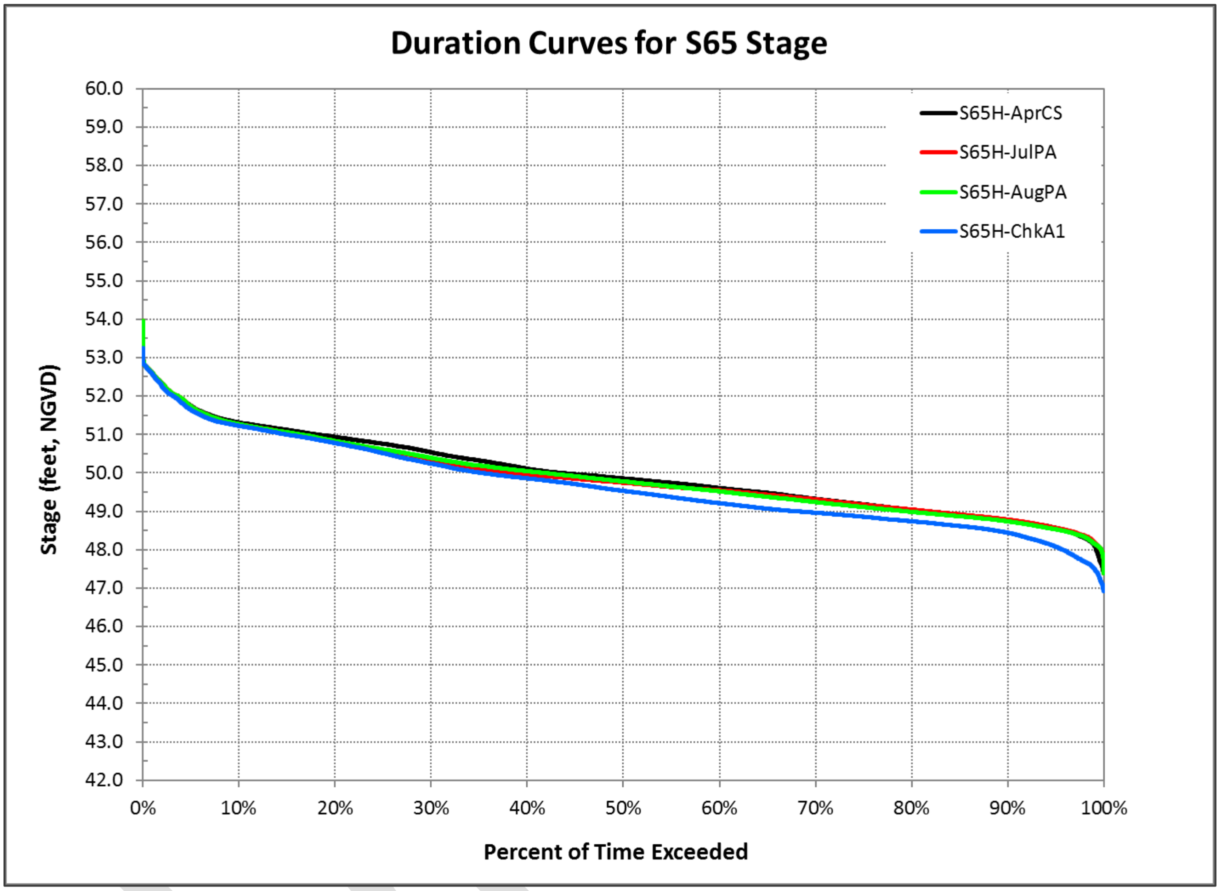

Figure 5-2. Sample stage duration curves for Lakes Kissimmee, Cypress, and Hatchineha.

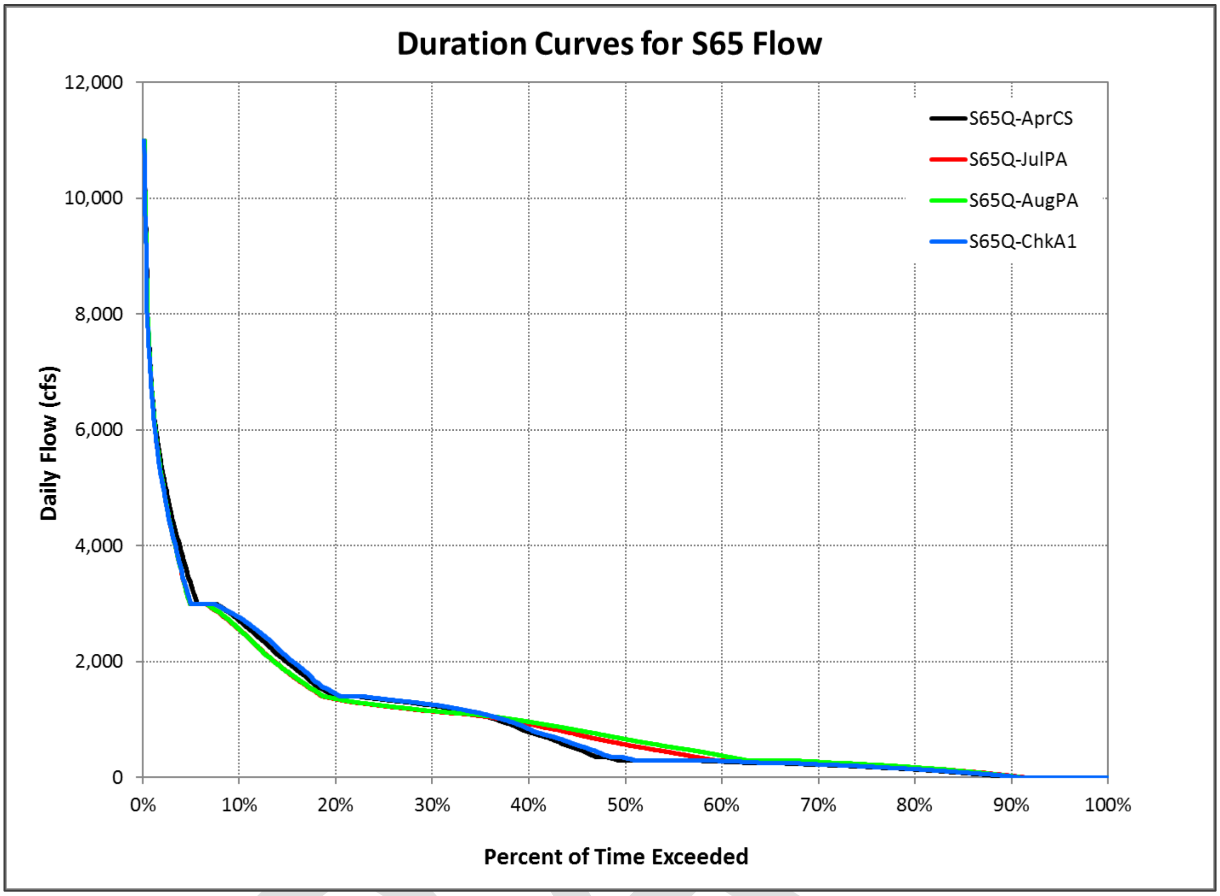

Figure 5-3. Sample flow duration curves for the S-65 structure.

5.2.3 Stage and Flow Percentiles

The StagePercsKCH, StagePercsTOH, and StagePercsETO worksheets contain charts of the stage percentiles for KCH, TOH, and ETO, respectively. These worksheets can be accessed using the corresponding KCH Stage Percentiles, TOH Stage Percentiles, and ETO Stage Percentiles buttons. Similarly, the FlowPercsKCH, FlowPercsTOH, and FlowPercsETO worksheets display flow percentiles for KCH, TOH, and ETO, respectively.

Percentiles are not hydrographs; rather, they are statistical summaries of the stage or flow distribution each day of the year. Percentiles are computed using all the years in the output; thus, for a 49-year simulation, each of the 365 days would have 49 data values for calculating each percentile statistic. The charts then connect the same percentile values for each day and display the iso-percentile curves. The percentile charts are helpful, particularly for position analysis simulations, to determine the probability of stages or flows exceeding particular values over time.

Figures 5-4 and **5-5** display example percentile plots for ETO stage and for KCH flow at the S-65 structure, respectively. The plots include options to specify the time window, percentiles of interest, and simulations to compare. The sample figures show outputs from a position analysis simulation, which initialized each of the 49 one-year simulations on July 1. The percentile plots also can be used for period-of-record simulations (i.e., a single 49-year simulation). Such plots are sometimes called cyclic analysis plots.

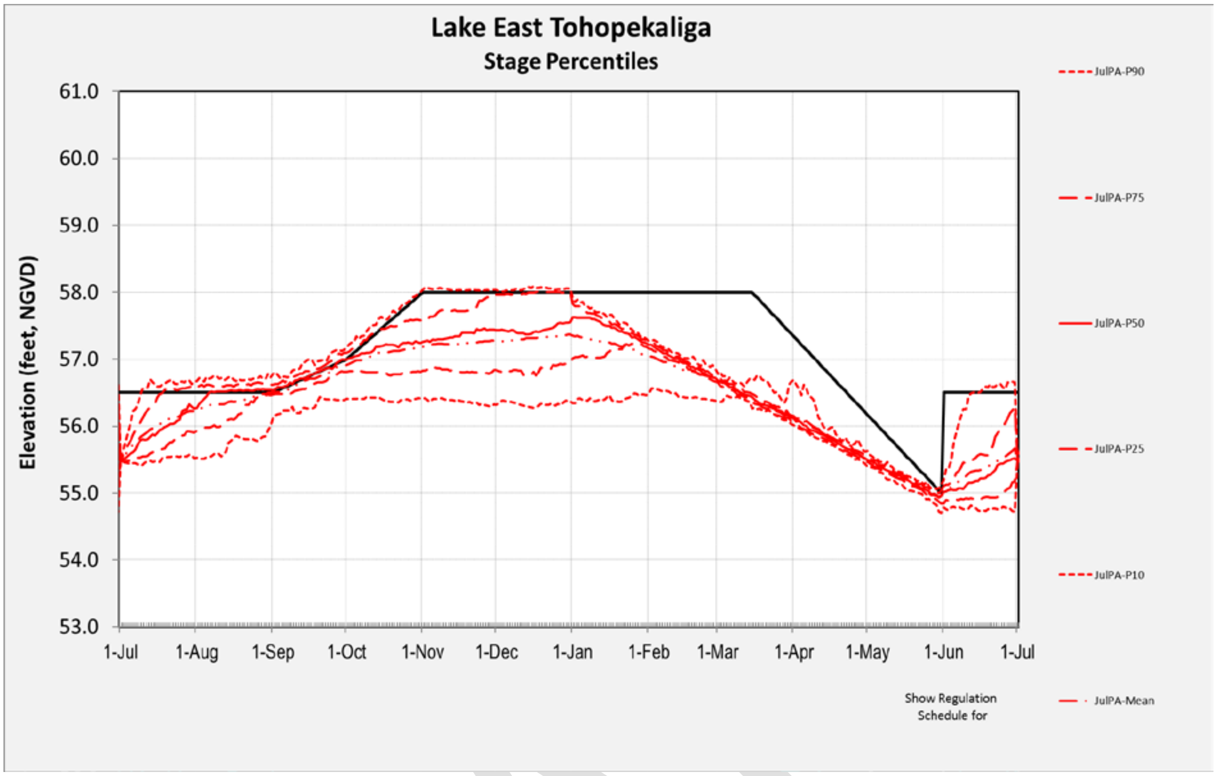

Figure 5-4. Sample stage percentile plot for East Lake Tohopekaliga.

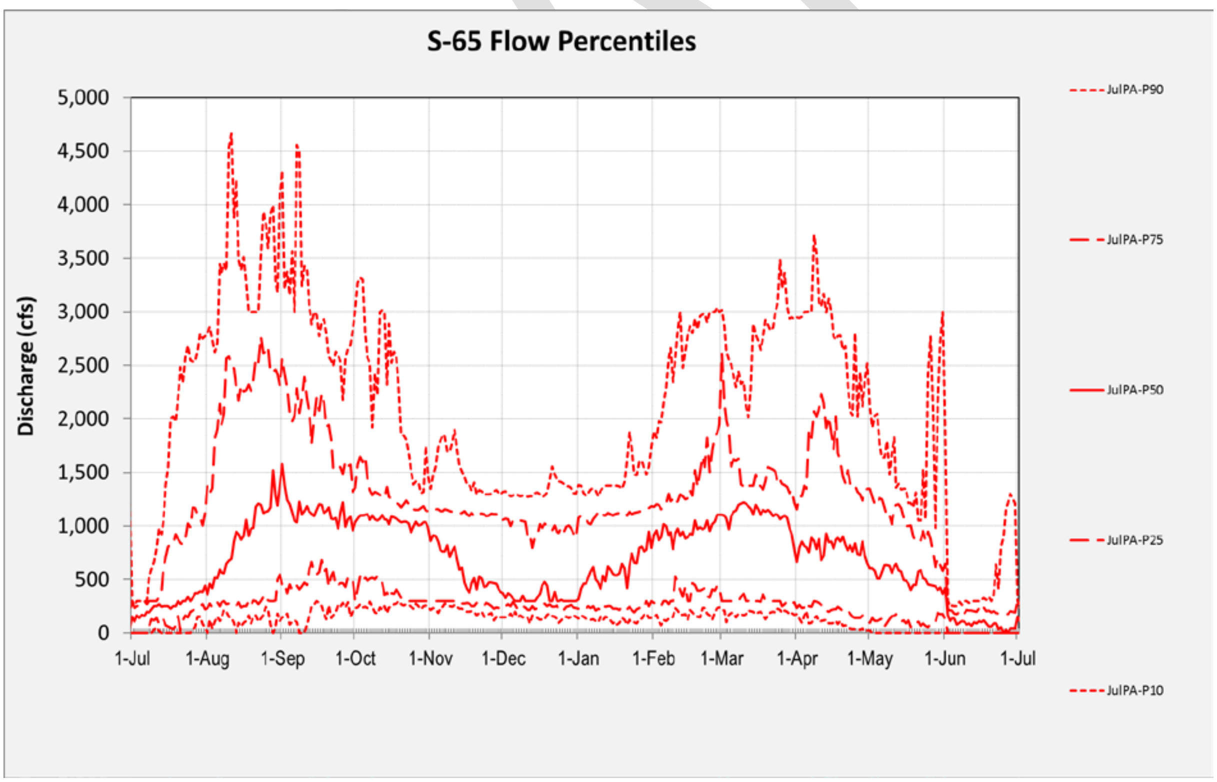

Figure 5-5. Sample flow percentile plot for Lakes Kissimmee, Cypress, and Hatchineha flows at the S-65 structure.

5.3 Hydrologic Performance Summaries

The UK-OPS Model automatically generates several measures of performance, most of which are derivatives of the fundamental stage and flow outputs and surrogates for ecological and/or water supply performance. New measures of performance typically are created based on the user's needs. Because the UK-OPS Model is a Microsoft Excel® application, modifying it to incorporate new measures, if desired, is relatively easy.

5.3.1 Water Budgets

The WatBuds worksheet can be accessed using the Water Budgets button. This worksheet contains charts that display the annual series of simulated water budget components for KCH, TOH, and ETO. **Figure 5-6** is an example showing KCH and TOH. The charts display the inflow components (WNI+RF and structure inflows) as positive values above the x-axis and the outflow components (ET, structure outflows, and water supply withdrawals) as negative values below the x-axis. Each year shows these components as stacked bars. The water year starts with the first month of position analysis simulations. For period-of-record simulations, the water year starts in January.

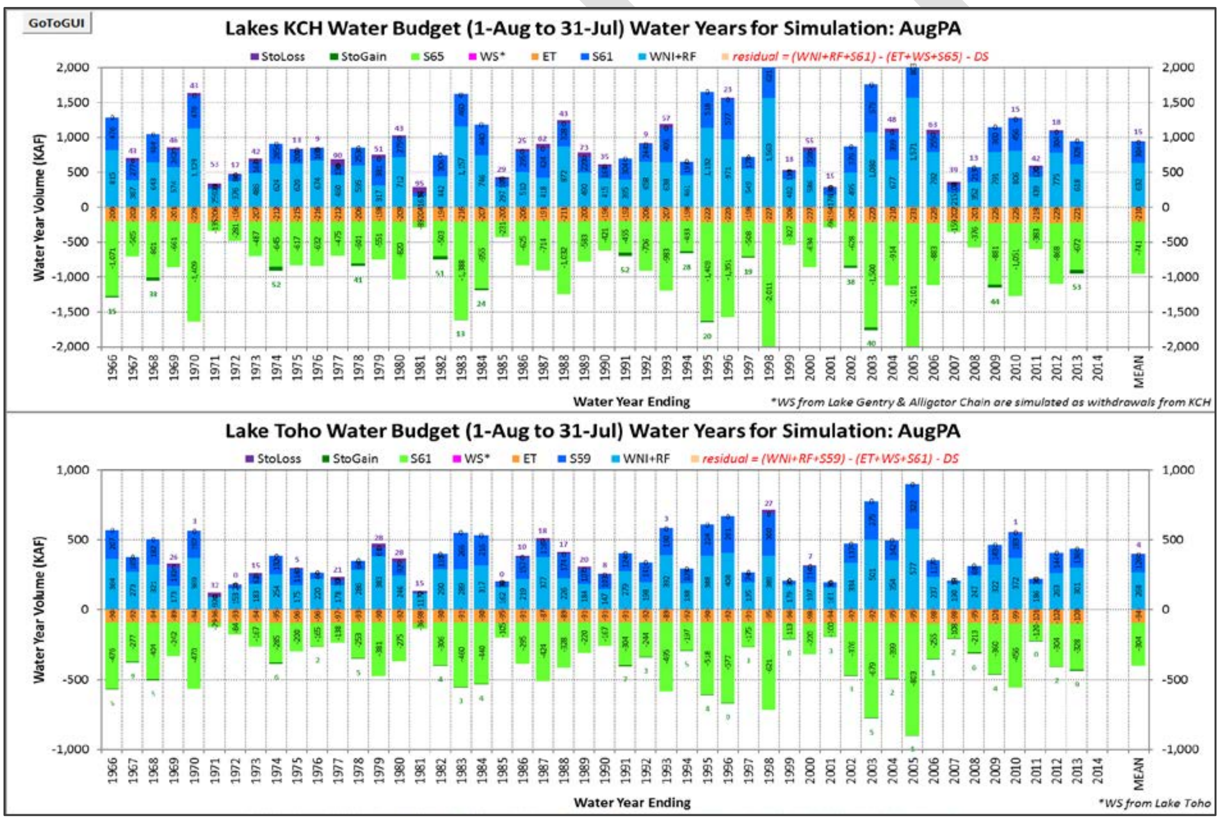

Figure 5-6. Sample water budgets for Lakes Kissimmee, Cypress, and Hatchineha and Lake Tohopekaliga.

For years with inflows exceeding outflows, the storage gain is displayed at the bottom of the bars. For years with outflows exceeding inflows, the storage loss is displayed at the top of the bars. Thus, the height of the positive components should always equal the height of the negative components. If the heights differ, then there is a problem with the mass balance. The residual term should always be zero and is displayed on the budget chart as a data label along the x-axis. Mass is conserved if the residual is zero, and non-zero values

indicate a possible error in the mass balance, which would require correction prior to using the simulation results. Good modeling practice includes verifying mass conservation for every simulation; these charts help make that check.

5.3.2 Event Table and Plot

The Events worksheet can be accessed using the Event Table & TS Plot button. This worksheet enables analysis of user-specified stage and flow events for KCH, TOH, and ETO. The upper half of the worksheet allows selection of the site and data type, stage or flow threshold and whether to count events above or below the threshold, definition of a significant event duration, and optional specification of a seasonal window to limit the analysis. The lower half of the worksheet displays a time series of the events (**Figure 5-7**). The chart uses rectangles to indicate the start and end dates of each event, and the rectangle height represents the average magnitude of each event. Event summary statistics are shown on the left margin of the chart for each simulation. Note that the graphic is not generic enough to allow particular simulation outputs to be turned off. Furthermore, results for position analysis simulations may not be meaningful unless the event window is selected to not overlap with the start date of the 1-year position analysis simulations.

Figure 5-7. Sample event summary for Lake Tohopekaliga simulated stage.

5.3.3 Max D-day Inundation

The MaxStages worksheet can be accessed using the Max D-day Inundation button. This worksheet enables analysis of the maximum yearly stage that occurred for a user-specified minimum duration of consecutive days and during a user-specified date window. The example chart in **Figure 5-8** shows a sample for KCH. The specified duration (D) was 30 days. The date window was August 1 to December 31. The chart compares four simulations year-by-year by showing the yearly maximum stage meeting the aforementioned criteria. The chart also has a dropdown menu to select the desired large lake system. Some of the less frequently used parameter inputs (e.g., the date window) are located under the chart and can be changed by temporarily moving the chart. Dropdown menus can be added to enable easier selection of the date window.

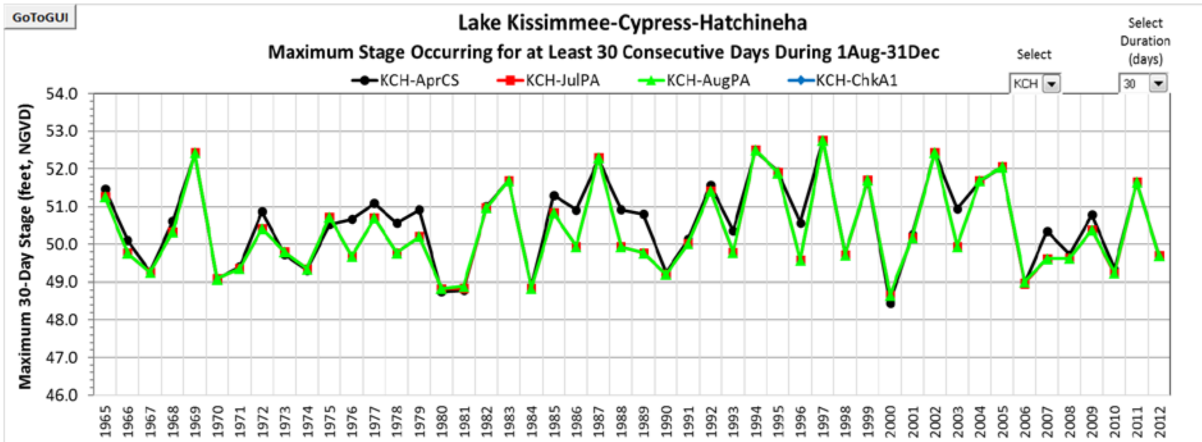

Figure 5-8. Sample maximum annual stage comparison at Lakes Kissimmee, Cypress, and Hatchineha.

An additional chart is displayed in the MaxStages worksheet to make relative comparisons between simulations (**Figure 5-9**). The annual values from the maximum stage chart for a prescribed baseline (AprCS in this example) are subtracted from the year-by-year values of the other simulations. Then the distribution of the yearly differences is displayed for each simulation using box and whisker plots. This relative performance comparison is similar to calculations for a paired T-test and helps illustrate the magnitude of the difference in maximum stages across the entire simulation period.

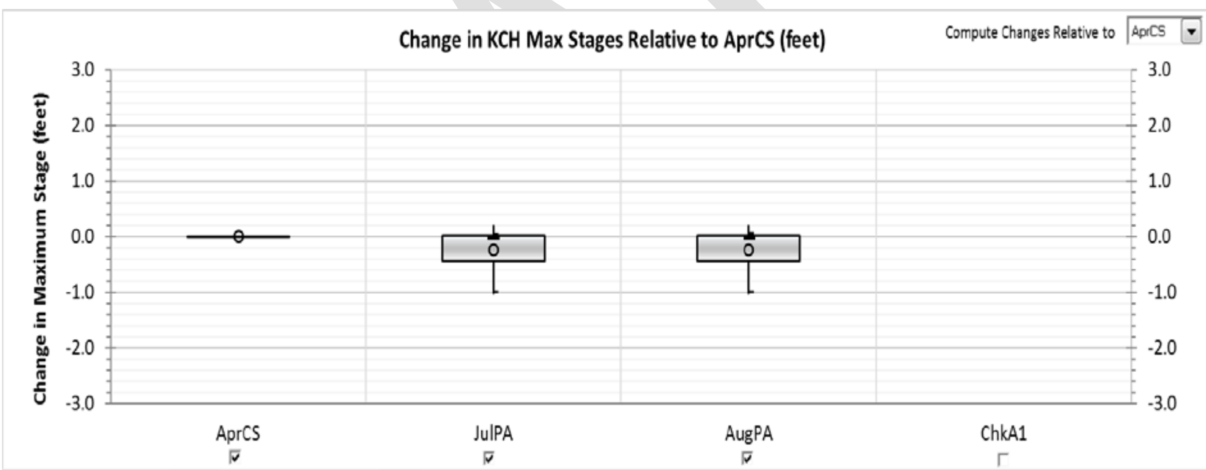

Figure 5-9. Sample event summary for Lake Tohopekaliga simulated stage.

A final note about the above two charts pertains to the check boxes located below the simulation names at the bottom of **Figure 5-9**. The check boxes control the display of the simulation output. The simulation named "ChkA1" is not displayed on either chart.

5.3.4 S-65 Annual Flow

The S65VolComp worksheet can be accessed using the S65 Annual Flow button. This worksheet enables evaluation of the effects of upstream operations and/or water supply withdrawals on the annual S-65 outflows from KCH.

The KRCOL Water Reservation set a maximum S-65 flow reduction limit of 5% for the period between 1965 and 2005. The baseline for evaluating proposed water supply withdrawals is the mean annual simulated S-65 flow for that period. The baseline simulation used historical data for WNI+RF, assumed the

future expected operation under the authorized Headwaters Revitalization Schedule for KCH, and assumed the current authorized regulation schedules for ETO and TOH. The 41-year mean annual S-65 flow from this baseline simulation is 704,000 acre-feet/year.

The performance metric shown in **Figure 5-10** was developed for the UK-OPS Model to compare simulations of proposed water supply withdrawals with the baseline flow limit. The chart shows the distribution of annual simulated flow at the S-65 structure via box and whisker plots. The mean annual flow is shown as a labeled dot on the plots. The x-axis labels display the percent change relative to the baseline simulation 41-year mean. The ChkHRS simulation in **Figure 5-10** represents the baseline condition. The mean for the ChkHRS simulation is 704,000 acre-feet/year and the percent change on the axis label is zero.

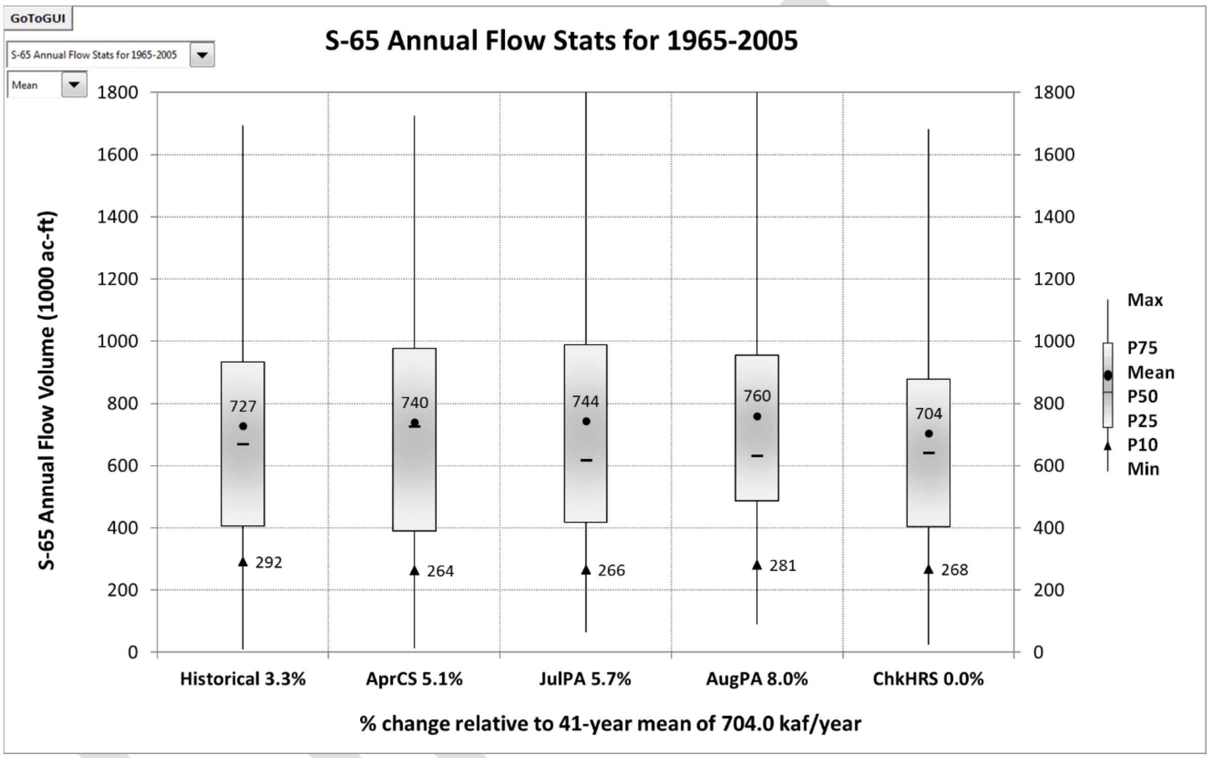

Figure 5-10. Sample annual flow statistics for the S-65 structure.

5.3.5 Water Supply Reliability

The WS_Table worksheet can be accessed using the WS Reliability button. This worksheet contains a table showing the number of days per month that water supply withdrawals occurred during the simulation. User controls allow specification of the lake system of interest: TOH, ETO, HMJ, MPJ, ALC, or GEN. Water withdrawals from KCH are not allowed by the draft KRCOL Water Reservation rules, so KCH is not included in the table. User controls also enable selection of the simulation name, a target reliability (percentage of time with water supply withdrawals) for computing performance, and the period for computing summary statistics.

Table 5-1 is an example water supply reliability table for a TOH water supply withdrawal scenario. The shaded cell values indicate the number of days in each month of each simulation year that water withdrawals occurred. The greens designate more days of withdrawals, whereas the oranges/reds indicate fewer days. The right side of the table summarizes the volumes withdrawn and the percent of time they occurred by season and by year. The summary at the bottom shows frequency statistics and the number of years that meet the user-specified reliability.

Table 5-1. Sample water supply reliability table for Lake Tohopekaliga.

	Lake TOH Water Supply Reliability Table for JF_WS															Percent of Time WS Withdrawal			
	No. of Days per Month with Lake Toho WS Withdrawals at 23.2 cfs (15.0 MGD)												Days	Vol(kaf)	AvgMGD	CalYear	WetSeas	DrySeas	WatYear
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan-Dec	Jan-Dec	Jan-Dec	Jan-Dec	May-Oct	Nov-Apr	May-Apr
1965	0	5	16	22	28	1	13	31	8	12	0	16	152	7.00	6.25	41.6%	50.5%		
1966	11	6	7	22	31	14	31	24	9	6	0	0	161	7.41	6.62	44.1%	62.5%	43.9%	42.5%
1967	0	15	18	22	24	1	13	31	20	1	0	0	145	6.68	5.96	39.7%	48.9%	37.3%	46.6%
1968	0	0	0	12	26	27	31	31	10	0	0	0	137	6.31	5.61	37.4%	67.9%	17.8%	27.9%
1969	23	9	6	22	29	1	0	0	6	30	8	6	140	6.45	5.75	38.4%	35.9%	42.0%	50.7%
1970	7	6	7	22	23	1	4	20	0	0	0	0	90	4.14	3.70	24.7%	26.1%	37.3%	33.4%
1971	0	0	0	3	18	0	0	0	0	0	0	0	21	0.97	0.86	5.8%	9.8%	9.9%	14.0%
1972	0	0	0	21	23	5	31	26	8	0	0	0	114	5.25	4.67	31.1%	50.5%	20.7%	10.7%
1973	0	25	18	21	23	1	0	16	30	5	0	0	139	6.40	5.71	38.1%	40.8%	41.0%	43.0%
1974	0	1	13	30	29	3	31	31	14	1	0	0	153	7.04	6.29	41.9%	59.2%	34.4%	32.6%
1975	0	0	0	22	28	1	0	30	24	8	5	0	118	5.43	4.85	32.3%	49.5%	23.6%	35.9%
1976	5	19	7	22	25	16	31	28	10	1	0	0	164	7.55	6.72	44.8%	60.3%	39.0%	40.7%
1977	7	23	7	23	27	1	0	5	15	4	0	3	115	5.29	4.73	31.5%	28.3%	41.0%	46.8%
1978	23	17	7	21	28	1	12	29	4	0	0	0	142	6.54	5.84	38.9%	40.2%	46.7%	33.7%
1979	4	28	12	22	31	1	0	2	27	9	0	0	136	6.26	5.59	37.3%	38.0%	45.8%	38.4%
1980	21	11	8	21	27	1	0	0	0	0	0	0	89	4.10	3.65	24.3%	15.2%	41.3%	35.8%
1981	0	0	0	0	6	1	0	3	29	1	0	14	54	2.49	2.22	14.8%	21.7%	2.8%	7.7%
1982	18	7	6	21	31	30	21	21	9	4	0	0	168	7.73	6.90	46.0%	63.0%	45.8%	29.0%
1983	9	17	7	21	29	22	30	21	9	6	7	6	184	8.47	7.56	50.4%	63.6%	39.2%	46.6%
1984	7	7	8	22	29	1	29	30	7	0	0	0	140	6.45	5.74	38.3%	52.2%	40.4%	47.5%
1985	0	0	3	30	26	1	6	31	26	2	0	0	125	5.75	5.14	34.2%	50.0%	27.8%	35.3%
1986	23	7	7	23	25	0	0	23	17	0	0	0	125	5.75	5.14	34.2%	35.3%	40.1%	41.6%
1987	30	12	6	21	29	1	0	0	0	0	20	21	140	6.45	5.75	38.4%	16.3%	46.2%	36.7%
1988	6	7	8	22	26	1	0	12	28	0	2	22	134	6.17	5.49	36.6%	36.4%	51.6%	31.1%
1989	7	4	10	22	26	0	0	18	20	9	0	0	116	5.34	4.77	31.8%	39.7%	43.9%	36.7%
1990	0	4	31	23	23	1	0	21	3	0	0	0	106	4.88	4.36	29.0%	26.1%	38.2%	35.9%
1991	0	0	20	30	31	30	23	21	5	9	0	0	169	7.78	6.95	46.3%	64.7%	38.2%	26.8%
1992	0	13	21	20	30	13	31	27	9	4	6	10	184	8.47	7.54	50.3%	62.0%	39.4%	47.3%
1993	7	6	6	22	27	1	9	3	15	0	0	0	96	4.42	3.95	26.3%	29.9%	39.6%	46.8%
1994	1	28	14	21	29	22	28	20	8	4	10	7	192	8.84	7.89	52.6%	60.3%	43.9%	32.6%
1995	7	7	7	22	29	1	6	31	23	7	8	6	154	7.09	6.33	42.2%	52.7%	42.0%	46.8%
1996	7	7	7	21	30	25	27	20	8	7	0	0	159	7.32	6.52	43.4%	63.6%	40.4%	41.8%
1997	11	16	7	21	31	1	19	30	7	0	1	26	170	7.83	6.99	46.6%	47.8%	40.6%	47.1%
1998	7	6	7	22	28	1	0	0	5	7	0	0	83	3.82	3.41	22.7%	22.3%	45.8%	43.0%
1999	0	25	18	22	28	4	31	29	15	7	7	7	193	8.88	7.93	52.9%	62.0%	43.9%	29.0%
2000	7	7	8	22	26	1	0	10	14	0	0	0	95	4.37	3.89	26.0%	27.7%	39.4%	47.0%
2001	0	0	0	13	24	1	28	27	17	2	0	0	112	5.16	4.60	30.7%	53.8%	17.5%	17.5%
2002	0	18	18	22	22	16	31	26	9	2	12	6	182	8.38	7.48	49.9%	57.6%	37.7%	43.0%
2003	7	7	6	22	30	23	27	19	9	4	2	15	171	7.87	7.03	46.8%	60.9%	42.5%	45.5%
2004	7	7	7	22	30	1	28	30	13	8	7	7	167	7.69	6.84	45.6%	59.8%	42.3%	47.0%
2005	7	6	7	21	31	28	20	20	2	7	12	7	168	7.73	6.90	46.0%	58.7%	40.6%	45.2%
2006	8	7	7	22	27	0	19	16	29	0	0	0	135	6.21	5.55	37.0%	49.5%	42.5%	46.8%
2007	0	25	16	22	20	24	31	23	13	3	1	1	179	8.24	7.36	49.0%	62.0%	39.2%	42.2%
2008	12	15	8	21	26	1	12	30	21	5	0	0	151	6.95	6.19	41.3%	51.6%	39.4%	47.0%
2009	0	2	14	30	28	30	28	21	9	1	0	12	175	8.06	7.19	47.9%	63.6%	34.9%	38.6%
2010	13	6	5	21	31	30	23	2	0	2	0	0	133	6.12	5.47	36.4%	47.8%	41.5%	47.7%
2011	0	15	26	22	25	1	18	31	19	7	6	4	174	8.01	7.15	47.7%	54.9%	41.5%	41.4%
2012	3	14	8	22	26	6	31	31	13	3	0	0	157	7.23	6.43	42.9%	59.8%	39.0%	43.2%
2013	0	0	13	30	30	24	31	24	9	3	0	0	164	7.55	6.74	44.9%	65.8%	34.4%	41.9%
MEANS																			
48YR	6	10	9	21	27	9	16	20	12	4	2	4	140	6.46	5.76	38.4%	47.5%	37.5%	38.4%
41YR	7	9	9	21	27	7	14	19	12	4	3	4	137	**6.29**	**5.61**	**37.4%**	45.7%	37.4%	37.4%

SUMMARY STATISTICS	CalYear	WetSeas	DrySeas	WatYear
No. of years used for stats	49	49	48	48
Years used for stats	'65-'13	'65-'13	'66-'13	'66-'13
# Yrs with WS duration > 50%	4	26	1	1
Annual Exceedance Frequency	8.2%	53.1%	2.1%	2.1%
Return Period (1-in-Nyrs)	12.3	1.9	48.0	48.0

5.3.6 Seasonal Distributions of Stage and Flow

The BoxWhiskerStage and BoxWhiskerFlow worksheets can be accessed using the Mon-Stage BoxWhisker and Mon-Flow BoxWhisker buttons, respectively. The stage chart compares the average daily stage for each month of each simulation (**Figure 5-11**). The flow chart compares the mean daily flow for each month of each simulation (**Figure 5-12**). These charts allow comparison of the monthly distributions for the user-specified simulations and sites; they also show the seasonal distributions of stages and flows. The box and whisker plots within each month are not labeled but are in the same order as shown in the legend.

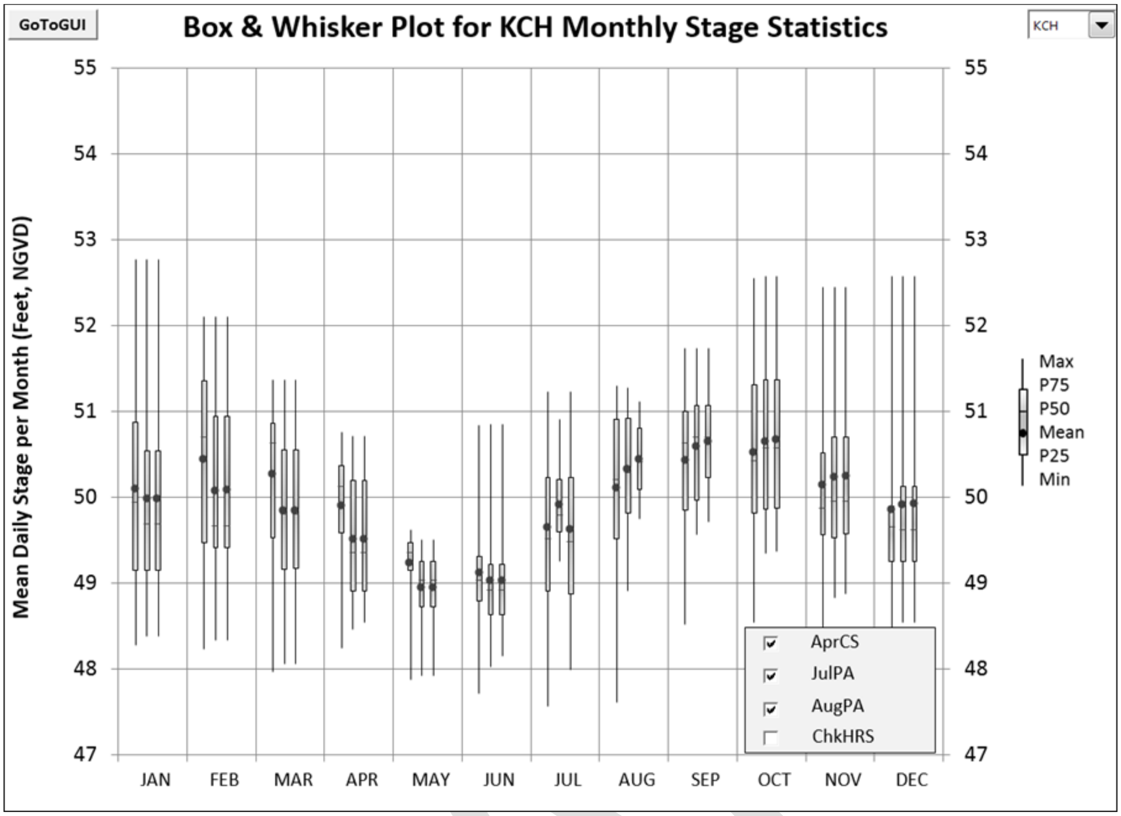

Figure 5-11. Sample monthly stage distributions at Lakes Kissimmee, Cypress, and Hatchineha.

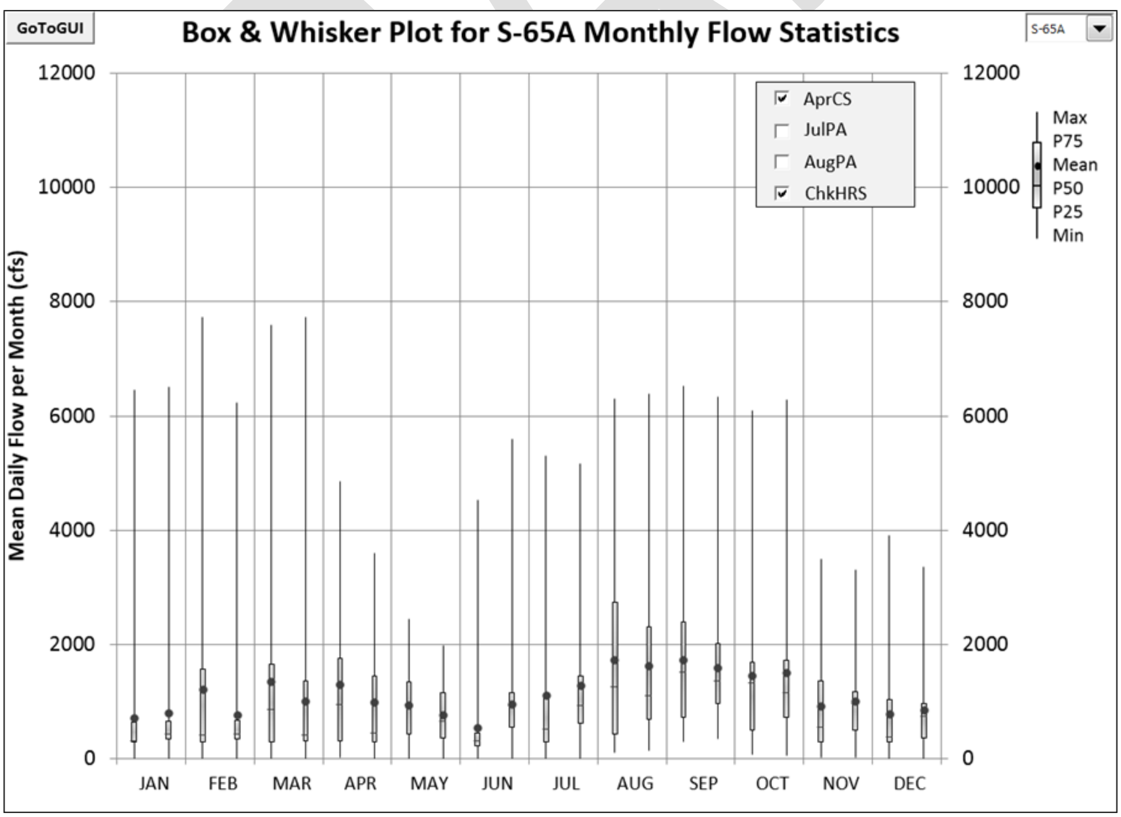

Figure 5-12. Sample monthly flow distributions at the S-65A structure.

6 MODEL VALIDATION

This section compares UK-OPS Model outputs to corresponding input data to demonstrate that the model produces reliable outputs. As described in **Sections 1** and **4**, the UK-OPS Model does not simulate the rainfall-runoff hydrologic process. Instead, it computes watershed inflows to each lake using key hydrologic information from detailed hydrologic models or the historical record. The version of the UK-OPS Model described in this report used the historical data record as the input data set for calculating the boundary condition inflows, namely the WNI+RF. Thus, the UK-OPS Model is not calibrated and validated in the same way as the supporting hydrologic models.

A validation simulation was performed that set the simulated outflows from the UKB's three large lake systems equal to the outflows used to calculate the boundary conditions (WNI+RF). This test aimed to validate the routing calculations by demonstrating the simulated stages were consistent with historical stages.

6.1 Lake Stage Comparisons

By setting the simulated outflows equal to the outflows used to calculate the boundary conditions (WNI+RF), the routing equations were expected to replicate the stage series used to calculate the boundary inflows. For the version of the UK-OPS Model described in this report, historical data were used to calculate the boundary conditions.

Figures 6-1 and **6-2** illustrate the stage and discharge hydrographs for KCH, TOH, and ETO for the first and last 8 years, respectively, of the 49-year simulation. The red traces represent the validation simulation (Val1), and they completely coincide with, and cover, the black traces representing the historical data (Hist). From these comparisons it is concluded that the routing equations in the UK-OPS Model are correct.

Figures 6-3, **6-4**, and **6-5** show the stage duration curves for KCH, TOH, and ETO, respectively, for the entire 49-year simulation period. These figures also show the red curves for the validation simulation completely coincide with, and cover, the black traces representing the historical values.

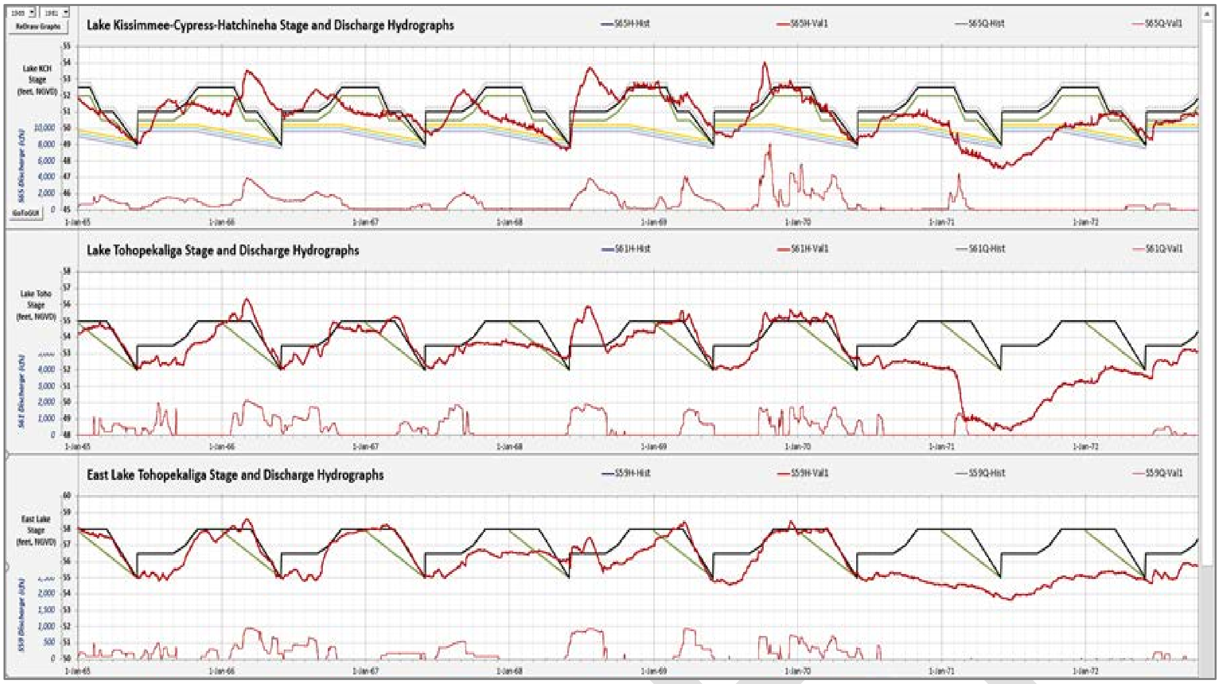

Figure 6-1. Simulated validation (red) and historical (black) hydrographs for 1965 to 1972.

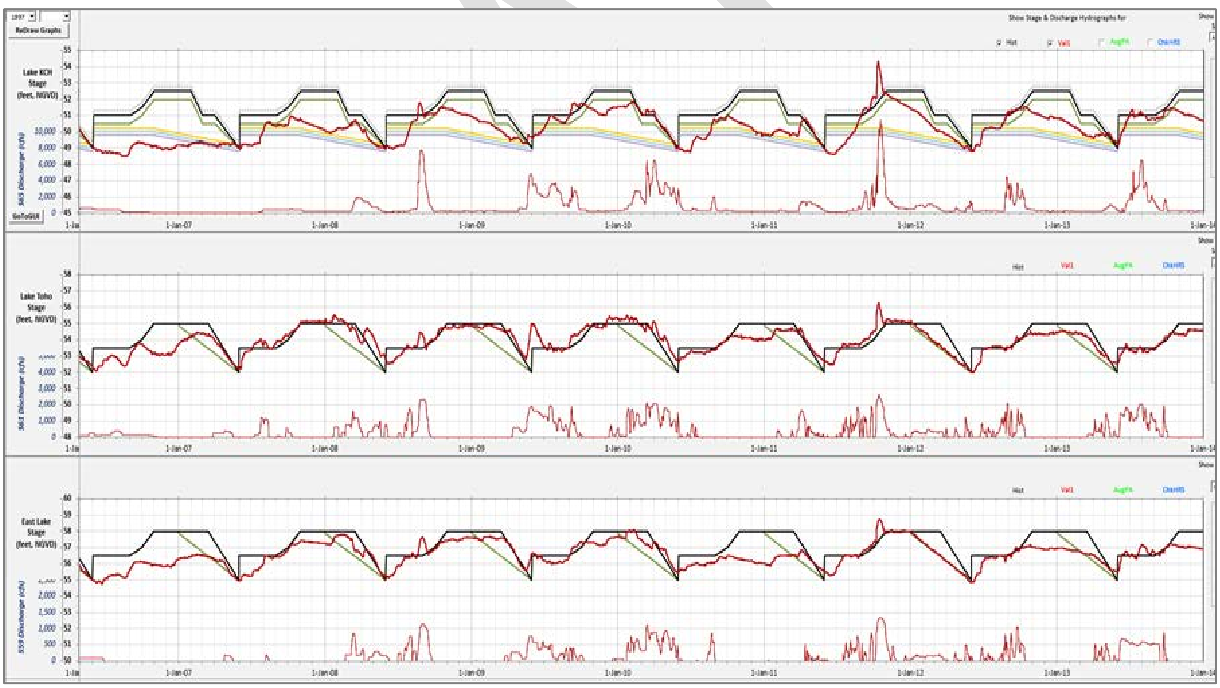

Figure 6-2. Simulated validation (red) and historical (black) hydrographs for 2006 to 2013.

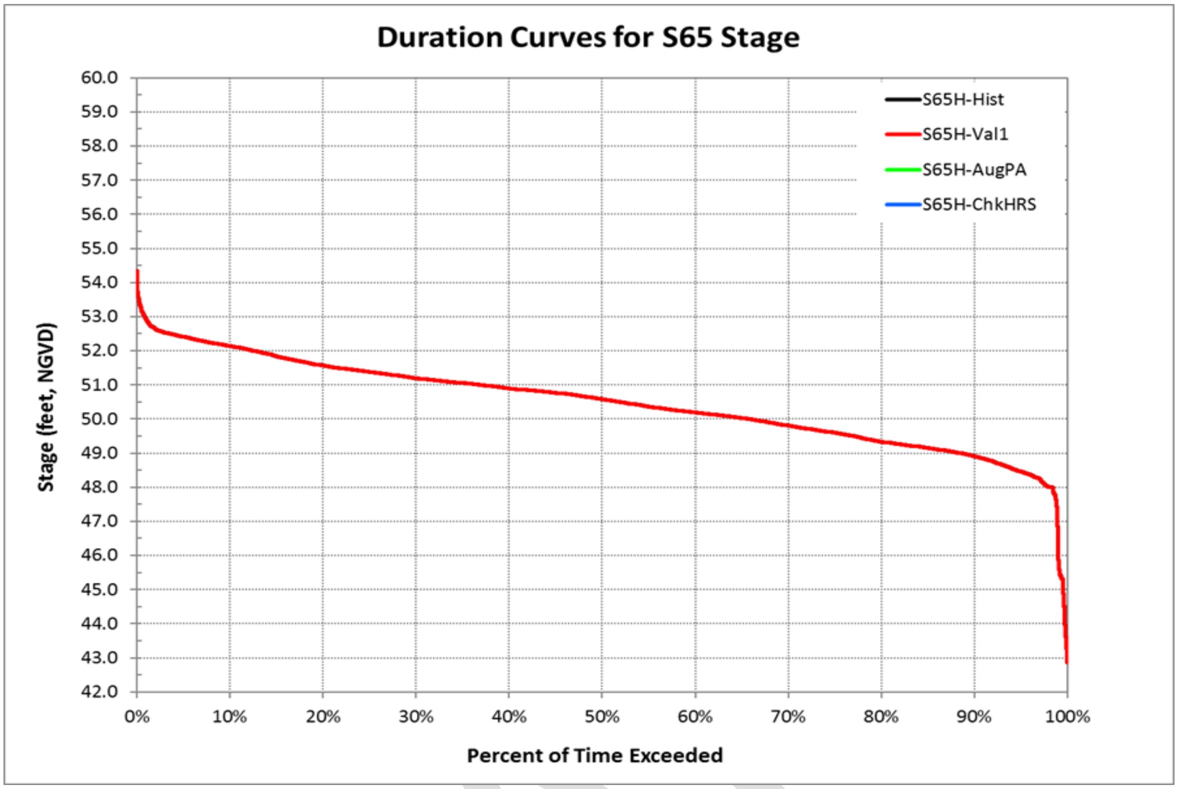

Figure 6-3. Lakes Kissimmee, Cypress, and Hatchineha stage duration curves: simulated validation (red) and historical (black; directly behind red line).

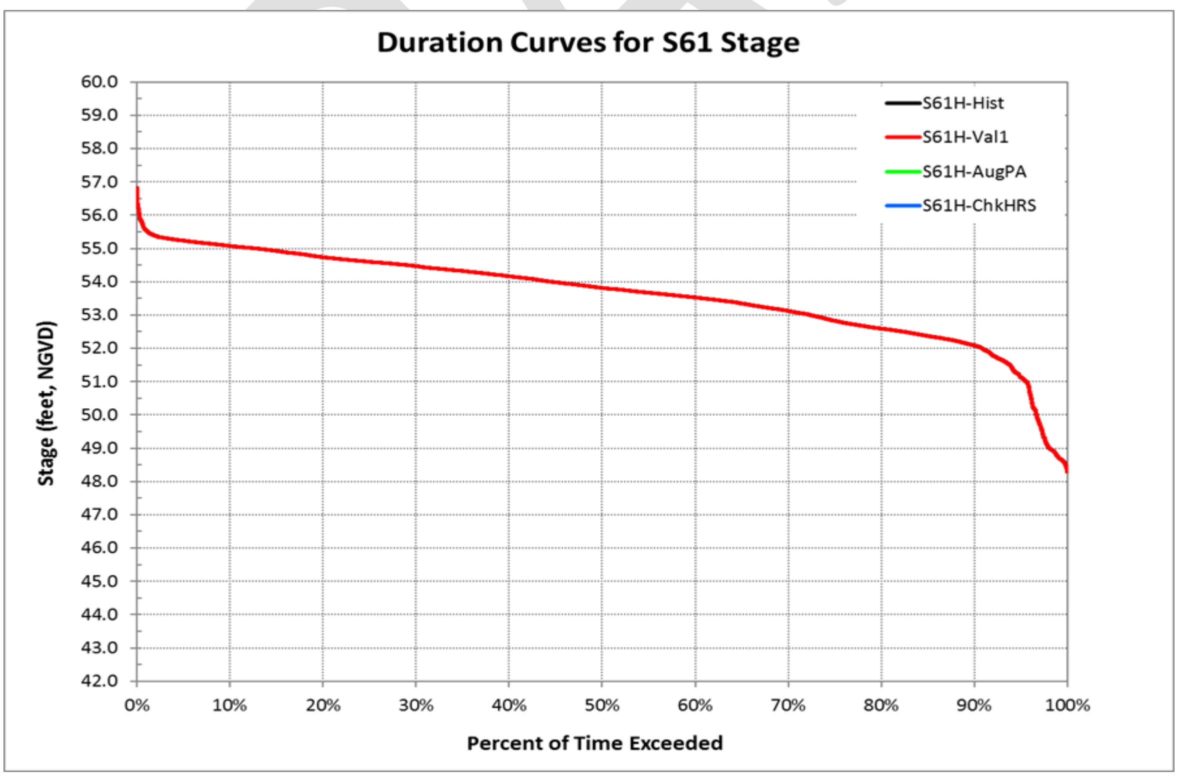

Figure 6-4. Lake Tohopekaliga stage duration curves: simulated validation (red) and historical (black; directly behind red line).

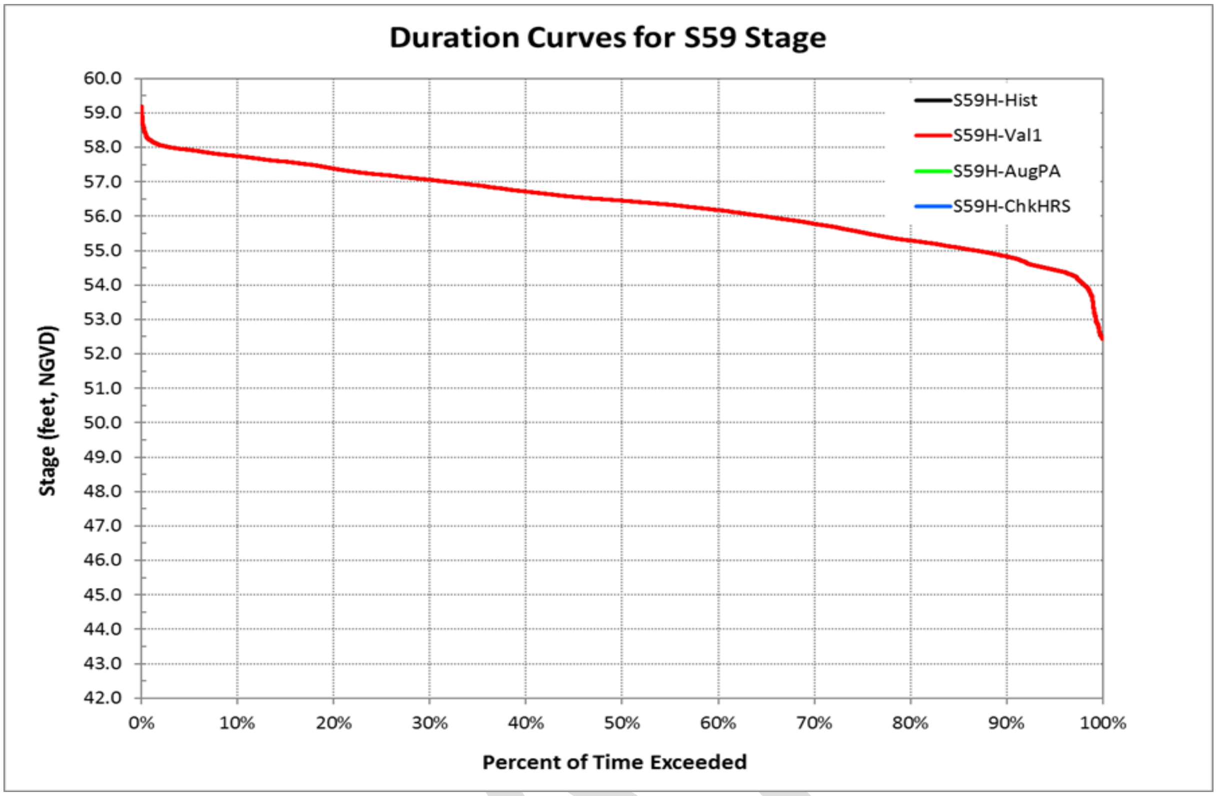

Figure 6-5. East Lake Tohopekaliga stage duration curves: simulated validation (red) and historical (black; directly behind red line).

6.2 Water Budget Comparisons

A fundamental requirement of any hydrologic model is that it conserves mass. In other words, the flows must be accounted for and the model should not create or destroy water (mass). **Figures 6-6**, **6-7**, and **6-8** compare the validation simulation and historical annual water budgets for KCH, TOH, and ETO, respectively. Residuals in the water balance are calculated as inflows minus outflows minus storage change, and zero values demonstrate mass balance. Inspection of these budgets shows identical results, verifying the validation simulation reproduces the historical input data and thus conserves mass.

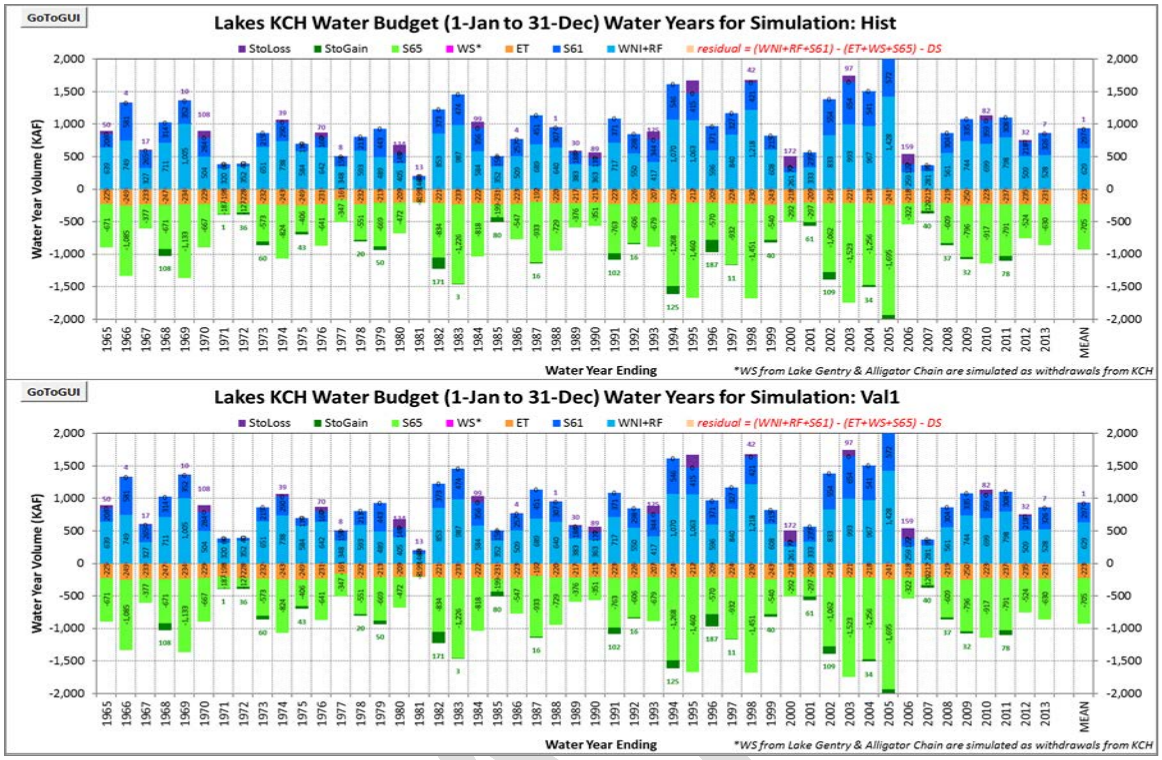

Figure 6-6. Lakes Kissimmee, Cypress, and Hatchineha annual water budgets: historical (top) and simulated validation (bottom).

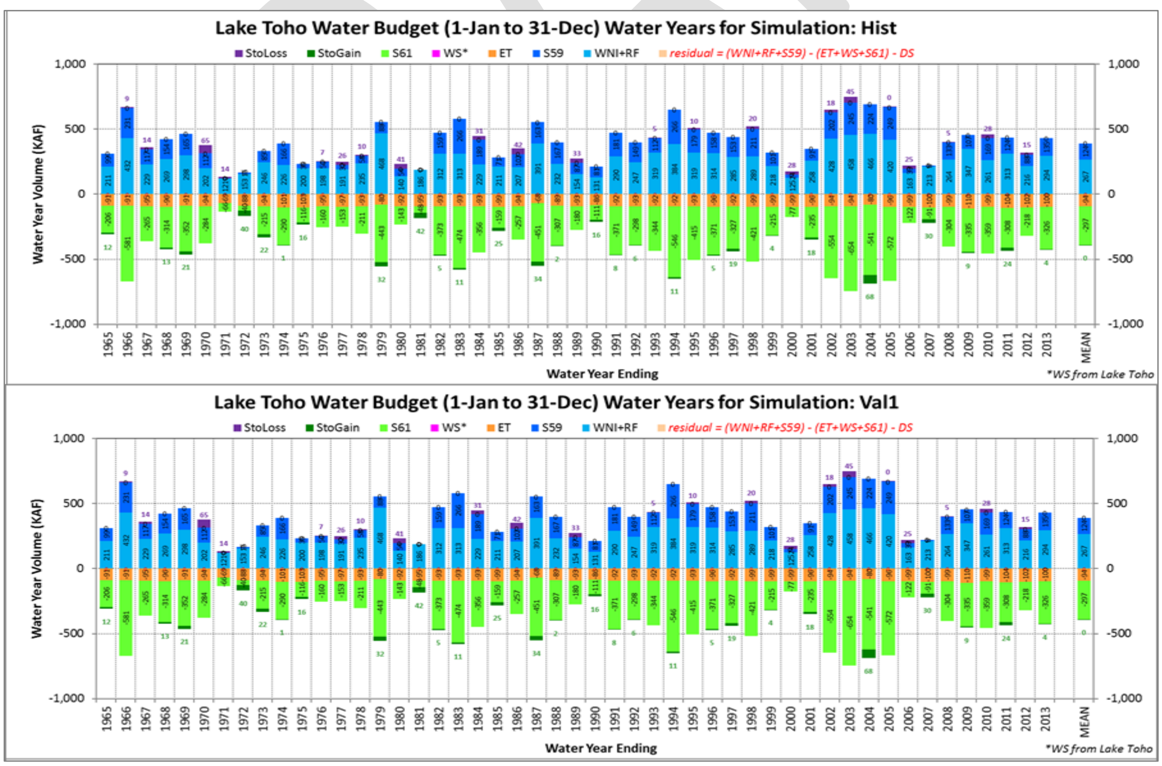

Figure 6-7. Lake Tohopekaliga annual water budgets: historical (top) and simulated validation (bottom).

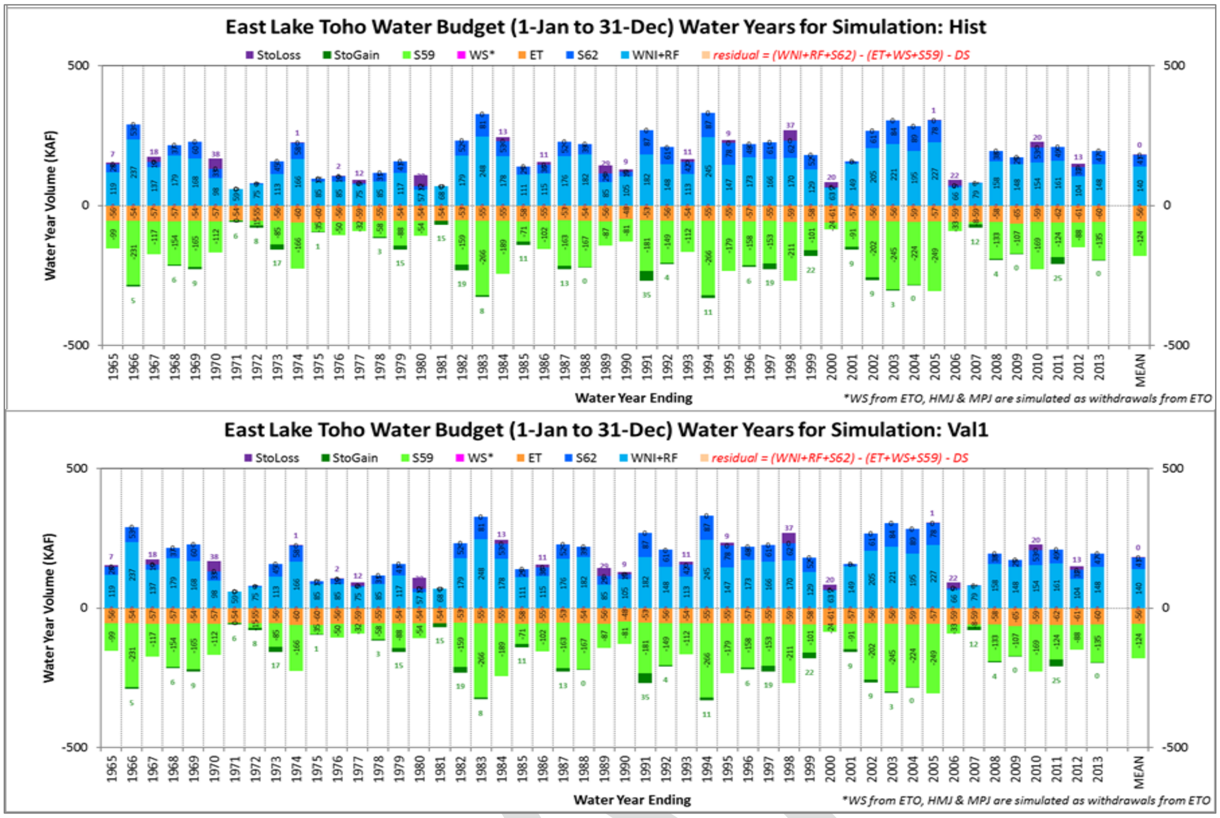

Figure 6-8. East Lake Tohopekaliga annual water budgets: historical (top) and simulated validation (bottom).

7 APPLICATIONS

The UK-OPS Model has been used for several applications since it was originally developed in 2014. This section briefly summarizes the purposes and findings from two of these applications to demonstrate some of the typical and appropriate uses of the model: 1) the SFWMD's monthly position analysis in support of the Operations Planning Program; and 2) a sensitivity analysis to demonstrate potential effects of the draft KRCOL Water Reservation rules from a hypothetical water withdrawal scenario.

Other applications of the UK-OPS Model not described in this report include: 1) pump sizing analysis to support the planning of the proposed ETO drawdown; 2) seasonal operations planning to design and evaluate alternative operations for KCH, TOH, and ETO; and 3) evaluation of the proposed Lake Toho Restoration/Alternative Water Supply Project. The Lake Toho Restoration/Alternative Water Supply Project evaluation was the first use of the UK-OPS Model to test impacts of proposed water withdrawals subject to the draft KRCOL Water Reservation rules.

7.1 SFWMD Position Analysis

Position analysis is a special form of risk analysis evaluated from the present position of the system. A position analysis evaluates water resource systems and the risks associated with operational decisions (Hirsh 1978). The SFWMD Dynamic Position Analysis (DPA) is an application of the South Florida Water Management Model (SFWMM) (SFWMD 2005) to estimate the probability distributions of stages and flows for Lake Okeechobee and the system south of the lake for the upcoming 11 months. The SFWMM DPA is deemed dynamic because it includes a 1-month warmup period to synchronize the simulated

antecedent hydrology with the actual hydrology. Details of the DPA are available on the SFWMD's Operations Planning webpage: https://www.sfwmd.gov/science-data/operational-planning.

The SFWMM relies on S-65E boundary inflows from another model. The UK-OPS Model has provided the S-65 flow boundary condition since 2015 when it was discovered that the previous model, the Upper Kissimmee Chain of Lakes Routing Model (UKISS) significantly underestimated S-65 flows for the 1997-1998 El Niño (very wet) period. Because the UK-OPS Model had the option to base the UKB hydrology on historical data, it was selected to support the SFWMM DPA until detailed basin models were updated and recalibrated.

Whenever a DPA is needed, usually at beginning of each month, the following UK-OPS Model steps are executed to produce the S-65 flow series, which is further processed by a river routing model for the Lower Kissimmee Basin to yield the SFWMM boundary flows at the S-65E structure.

1. Review seasonal operating strategy and modify the UK-OPS Model assumptions, as necessary.

2. Determine the initial stage values using real-time posted stage values for KCH, TOH, and ETO, and enter initial stages and start date in the UK-OPS Model GUI.

3. Run the model and evaluate key performance metrics, including water budgets, stage and discharge hydrographs, and percentile plots.

4. Communicate results to the operations planning team for further processing and preparation of the SFWMM DPA. The **Attachment** contains an example email communicating the assumptions and results for the August 2019, UK-OPS Model position analysis simulations.

Figure 7-1 illustrates the S-65 flow percentile chart for the August position analysis simulation. The distribution shows the high variability in flow as early as 2 to 4 weeks after the August 1 initialization. It is important to note that the position analysis is not a forecast but rather a distribution of possible outcomes based on the variability of historical rainfall conditions.

Figures 7-2, **7-3**, and **7-4** show the stage percentile plots for the August position analysis simulations for ETO, TOH, and KCH, respectively. These percentile plots illustrate the distribution of stages each day of the 1-year look-ahead period. The charts represent the probability distributions of lake stages for each day of the upcoming year, assuming current initial conditions and the rainfall for each simulation year is equally likely to occur.

The percentile charts for TOH and ETO show the relatively tight distribution of stages during the January to May spring recession operation. The KCH percentiles show wide variability, particularly during the November to May dry season. Stages in KCH tend to track well-below the top of the regulation schedule because the operations are designed to discharge meaningful flows to the Kissimmee River when the stage is below the top of the regulation schedule.

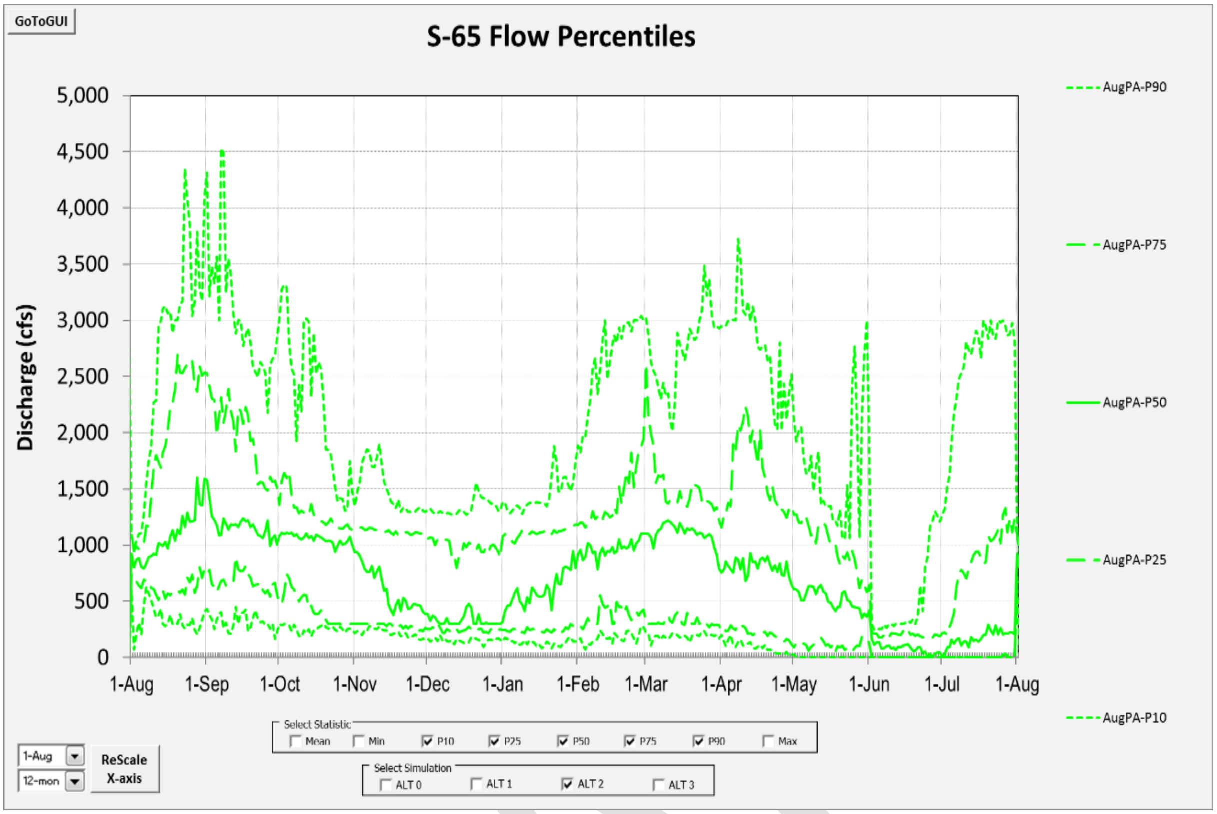

Figure 7-1. S-65 flow percentiles for the August 2019 position analysis.

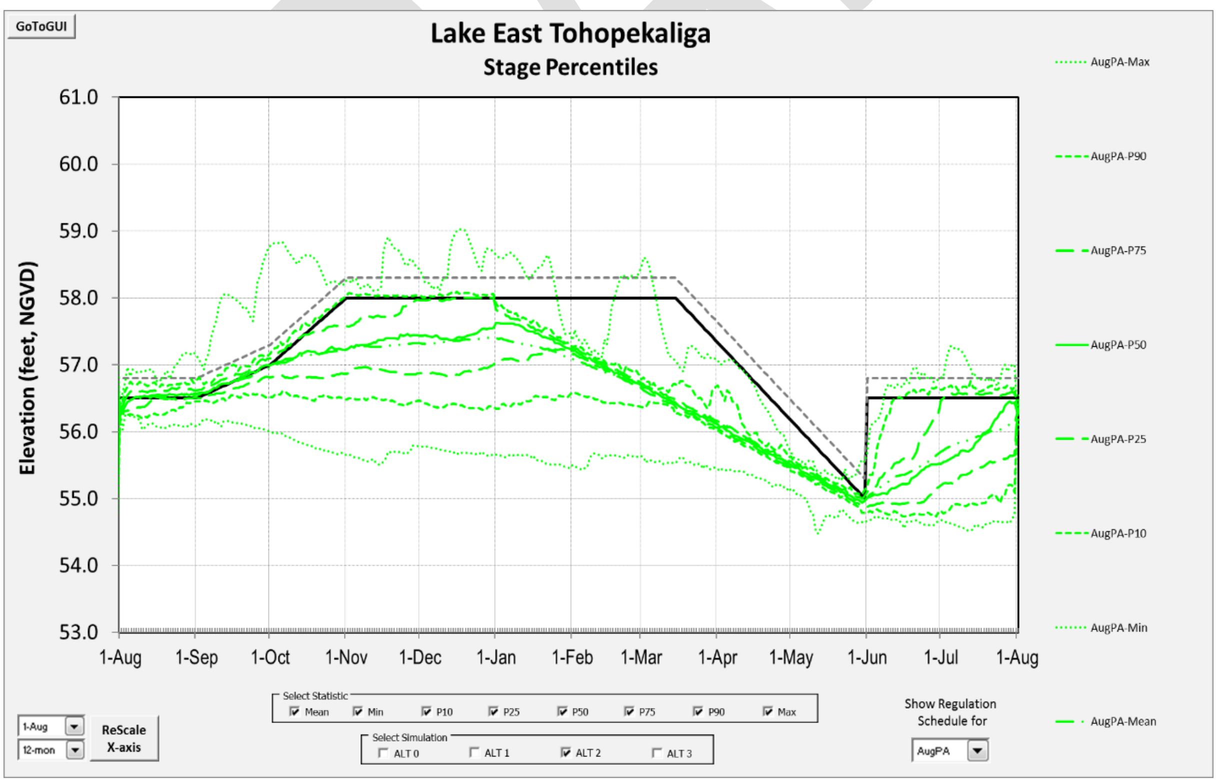

Figure 7-2. East Lake Tohopekaliga stage percentiles for the August 2019 position analysis.

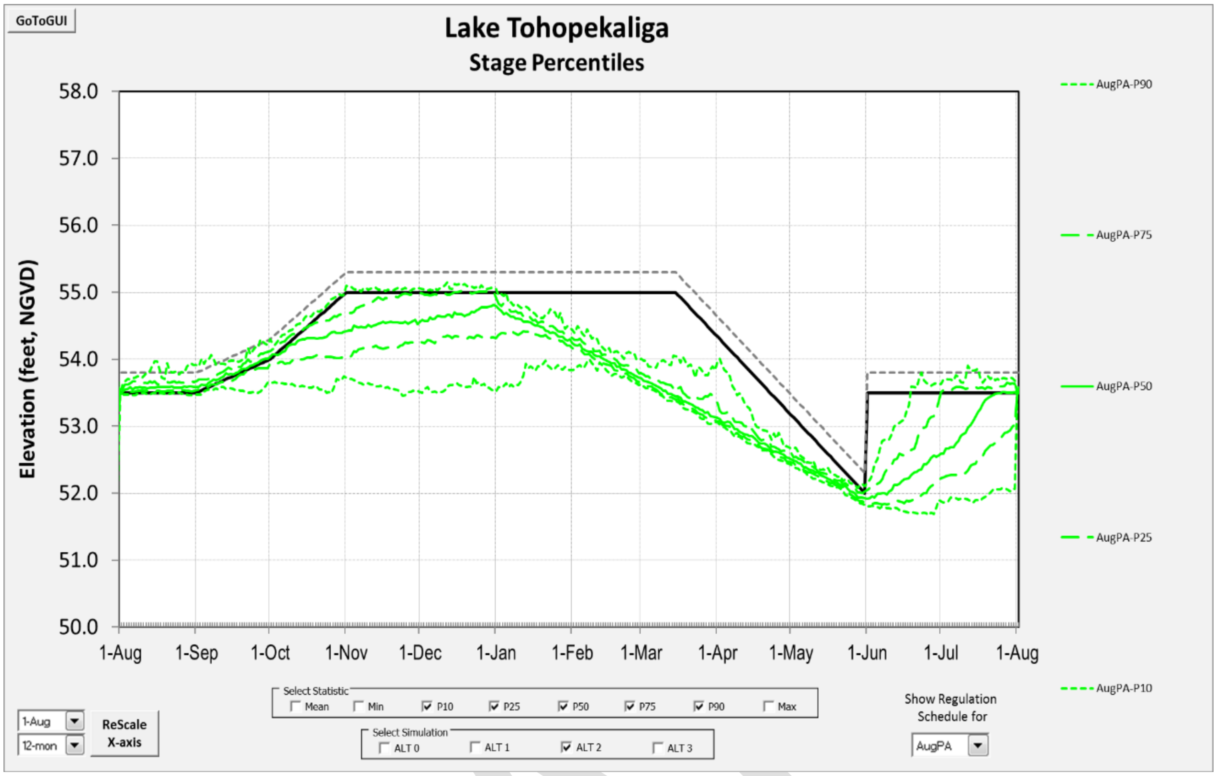

Figure 7-3. Lake Tohopekaliga stage percentiles for the August 2019 position analysis.

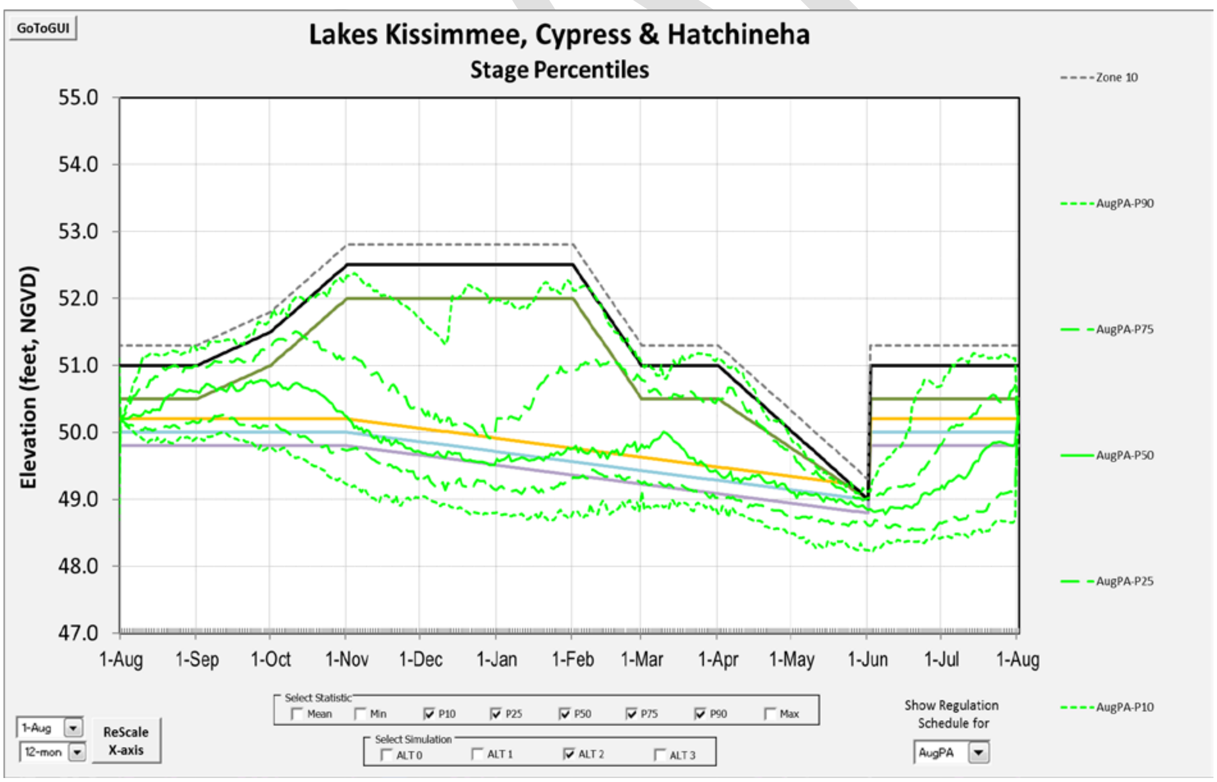

Figure 7-4. Lakes Kissimmee, Cypress, and Hatchineha stage percentiles for the August 2019 position analysis.

7.2 Sensitivity Analysis of Hypothetical Water Supply Withdrawals with Draft KRCOL Water Reservation Rule Criteria

This application of the UK-OPS Model investigated the effects of hypothetical water supply withdrawals from TOH with the draft KRCOL Water Reservation rule criteria. Water supply withdrawal reliability also was assessed with and without the proposed Lake Okeechobee constraint. Results of the sensitivity analysis are presented in this section, following a short summary of the components of the draft KRCOL Water Reservation rule criteria.

The draft KRCOL Water Reservation rules set WRLs in six of the lake systems in the UKB. **Figures 7-5** and **7-6** illustrate the WRLs for ETO and TOH, respectively. The red dashed line denotes the WRL, which was designed to protect the water needed for fish and wildlife of the lake system. The general concept is that water withdrawals can occur if the lake stage is above its respective WRL. However, there can be additional constraints on withdrawals. For example, if water withdrawals are considered for HMJ, then the stage in HMJ must exceed its WRL and the stage in ETO also may need to exceed its WRL. However, if Lake Okeechobee is not releasing water to the estuaries in order to manage the lake stage (i.e., regulatory discharges), then withdrawals from HMJ are restricted. If the all the conditions are met, then withdrawals can occur on that day. The process repeats each day of the simulation.

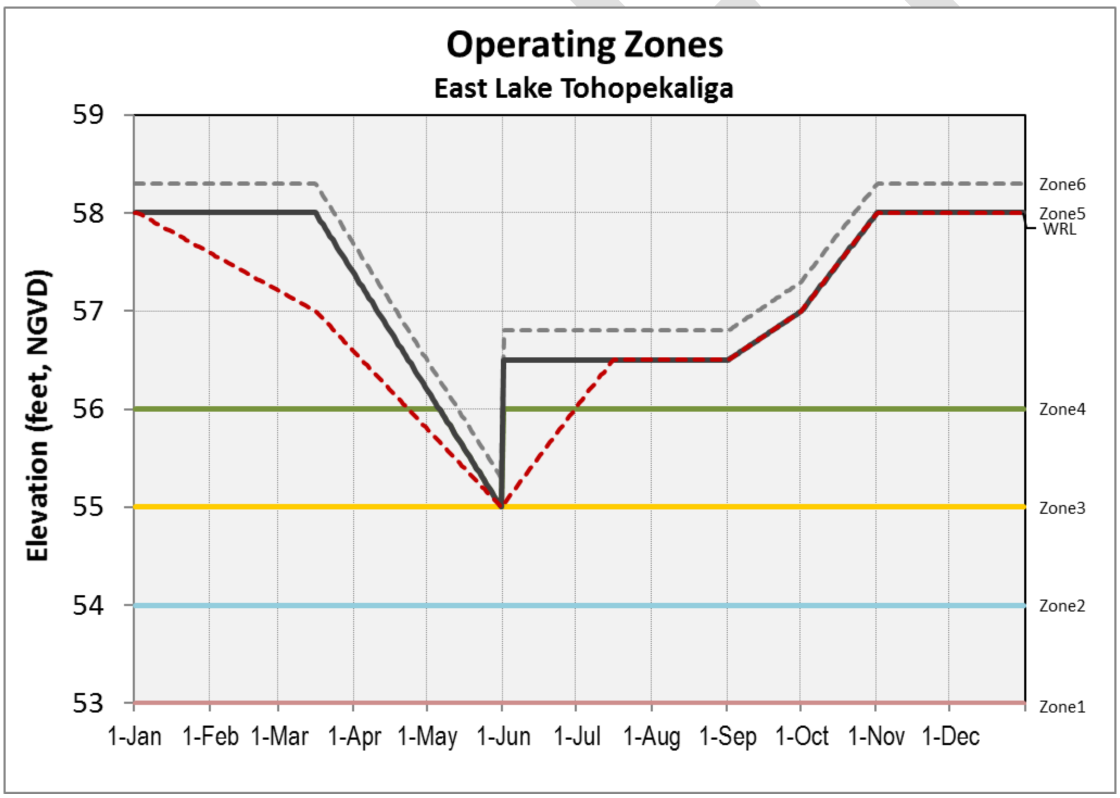

Figure 7-5. East Lake Tohopekaliga regulation schedule with proposed water reservation line (red dashed line).

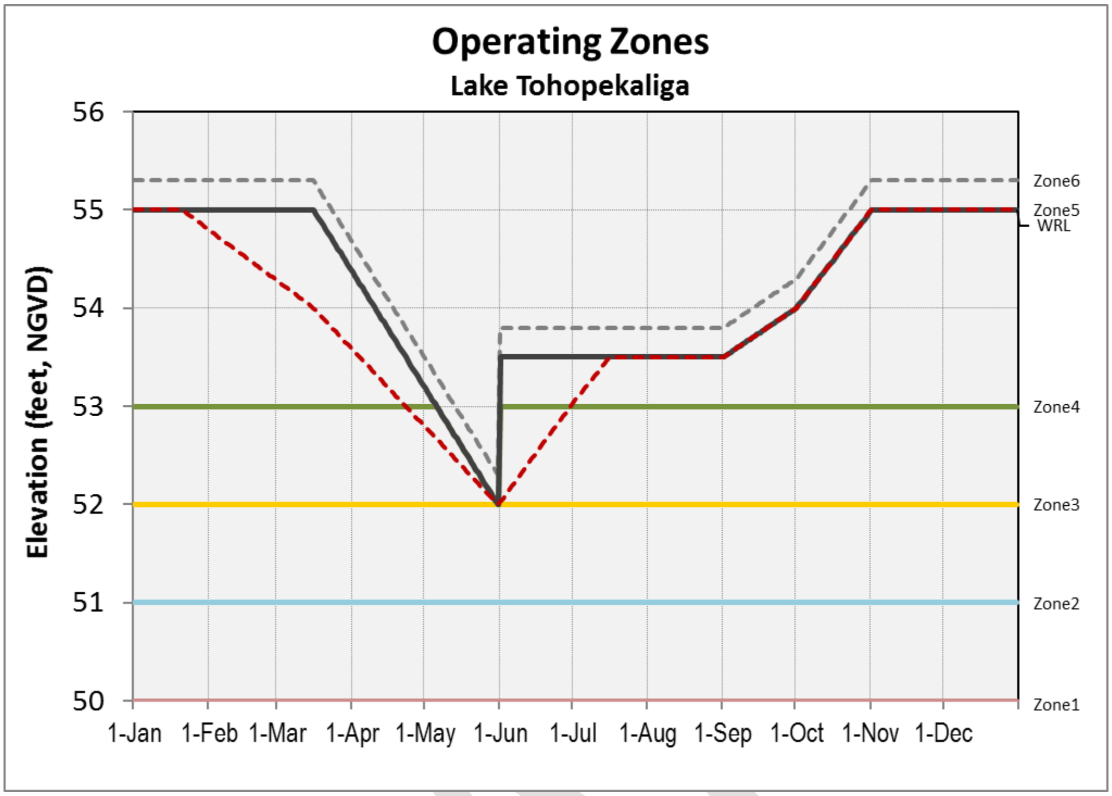

Figure 7-6. Lake Tohopekaliga regulation schedule with proposed water reservation line (red dashed line).

7.2.1 Baseline Scenario

The first scenario simulation (hereafter referred to as Base) was a baseline that used KCH Headwaters Regulation Schedule (**Figure 3-10**) and the standard regulation schedules for ETO and TOH (**Figures 3-1** and **3-5**, respectively; **Figures 7-5** and **7-6**, respectively). No water supply withdrawals were assumed.

7.2.2 Water Supply Withdrawal Scenario 1

Scenario 1, hereafter WSmax, used the same assumptions as Base but included water supply withdrawals from TOH. The capacity of the infrastructure needed to make the withdrawal was fixed at 64 million gallons per day (99 cfs), but the daily withdrawal rate was subject to the constraints of the draft KRCOL Water Reservation rules. No water supply withdrawals from the other lake systems were assumed in this hypothetical scenario.

7.2.3 Water Supply Withdrawal Scenario 2

Scenario 2, hereafter WSmaxL, was identical to the Scenario 1 except for the addition of the Lake Okeechobee constraint. The same baseline simulation (Base) was used for the relative comparison. Withdrawals from UKB lakes could reduce water availability downstream. The Lake Okeechobee constraint was designed to limit adverse impacts to permitted water users downstream of the UKB by limiting withdrawals from UKB lakes to when regulatory releases from Lake Okeechobee are being made to one or both of the coastal estuaries (Caloosahatchee River and/or St. Lucie Estuary).

The approximation of this constraint is depicted in **Figure 7-7**. The Lake Okeechobee hydrograph for a portion of the simulation of the 2008 Lake Okeechobee Regulation Schedule is colored green when the stage is above the Low Sub-band, indicating regulatory releases are being made to either the Caloosahatchee River or St. Lucie Estuary. The lake stage is colored red when the stage is below the Low Sub-band of the 2008 Lake Okeechobee Regulation Schedule, indicating relatively low water conditions with no regulatory releases being made to either the Caloosahatchee River or St. Lucie Estuary. When the lake stage is colored red, the Lake Okeechobee constraint is met, and no water supply withdrawals can be made from UKB lakes. When the stage is green, then water supply withdrawals can be made from UKB lakes.

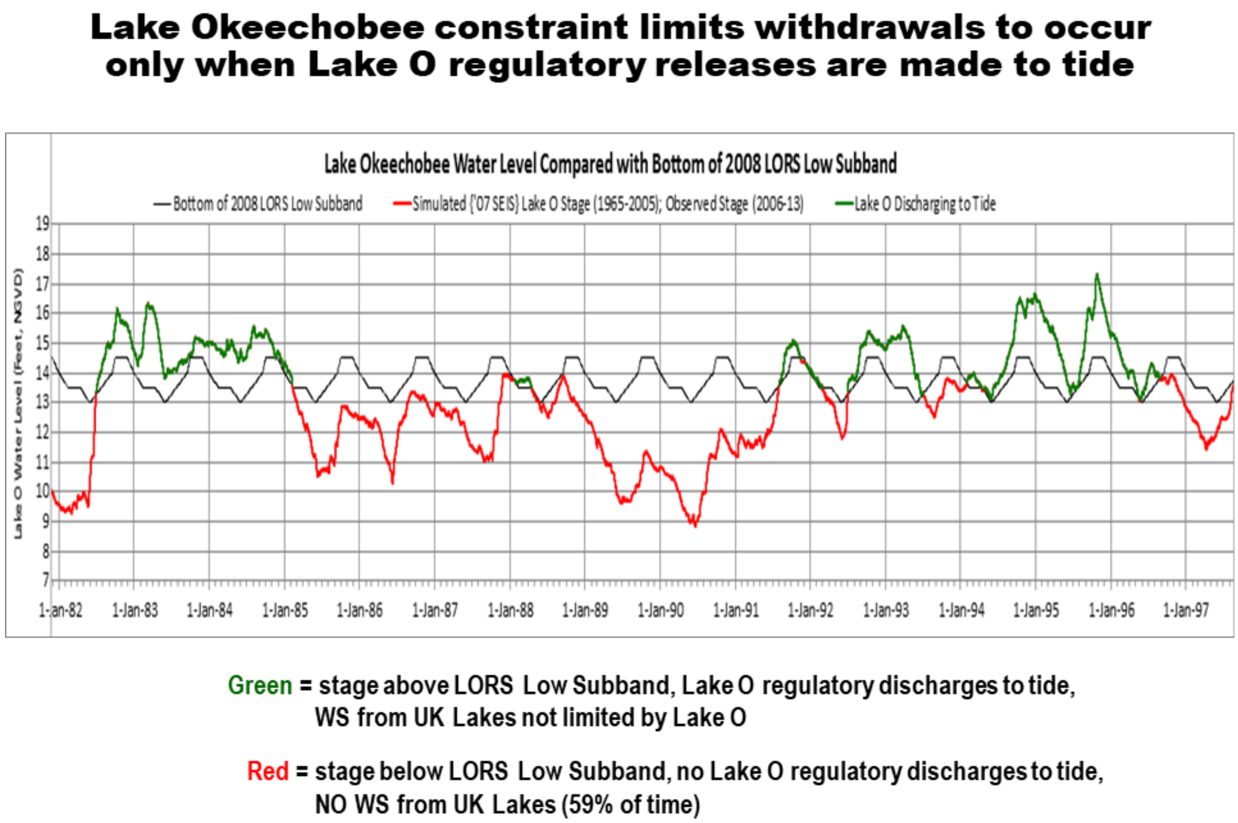

Figure 7-7. Lake Okeechobee constraint used by the UK-OPS Model.

7.2.4 Simulation Results

The UK-OPS Model simulation of the Base, WSmax, and WSmaxL scenarios revealed the effects of one possible withdrawal scenario on the draft KRCOL Water Reservation rule criteria. The outputs examined and presented here are limited to comparisons of TOH water budgets, TOH stage percentiles, S-65 annual flow, and water supply reliability.

7.2.4.1 Lake Tohopekaliga Water Budget

Figure 7-8 shows the TOH annual water budget for the WSmax and WSmaxL simulations. The water supply withdrawal component is shown for each simulation year and is small relative to the other water budget components. Note that the WSmaxL scenario has less withdrawal volume. Annual average withdrawal decreases from 39,000 acre-feet/year for WSmax to 19,000 acre-feet/year for WSMaxL, a 51% reduction that is due to the Lake Okeechobee constraint, which significantly reduces the number of days withdrawals can be made.

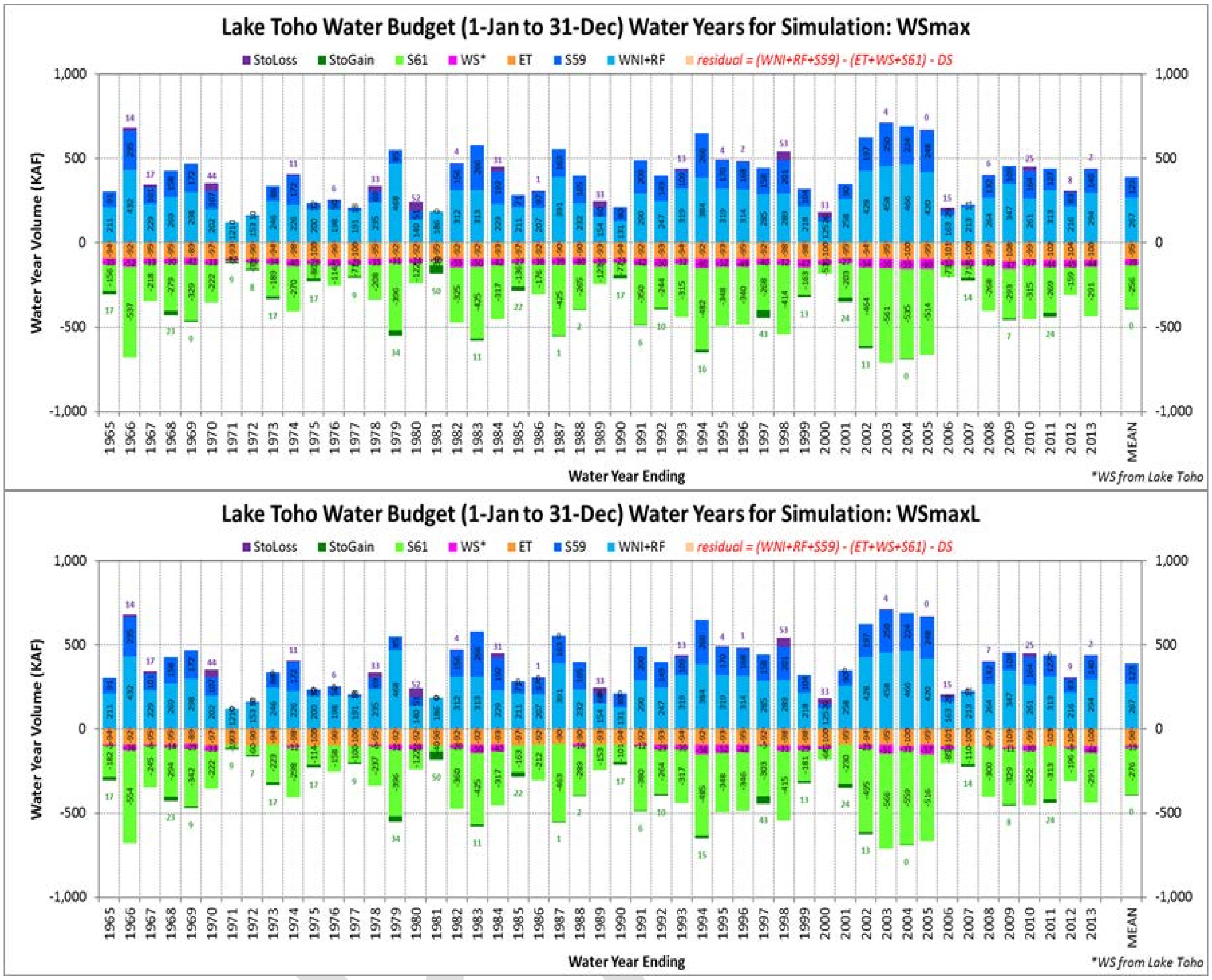

Figure 7-8. Water budget comparison of WSmax and WSmaxL for Lake Tohopekaliga.

7.2.4.2 Lake Tohopekaliga Stage Percentiles

Figure 7-9 compares the TOH stage percentiles for the three simulations (Base, WSmax, and WSmaxL). Results demonstrate a downward shift in the percentiles of the WSmax scenario (red) relative to the Base (black). The WSmaxL scenario (green) falls between the other simulations because the withdrawals are less than those of the WSmax simulation.

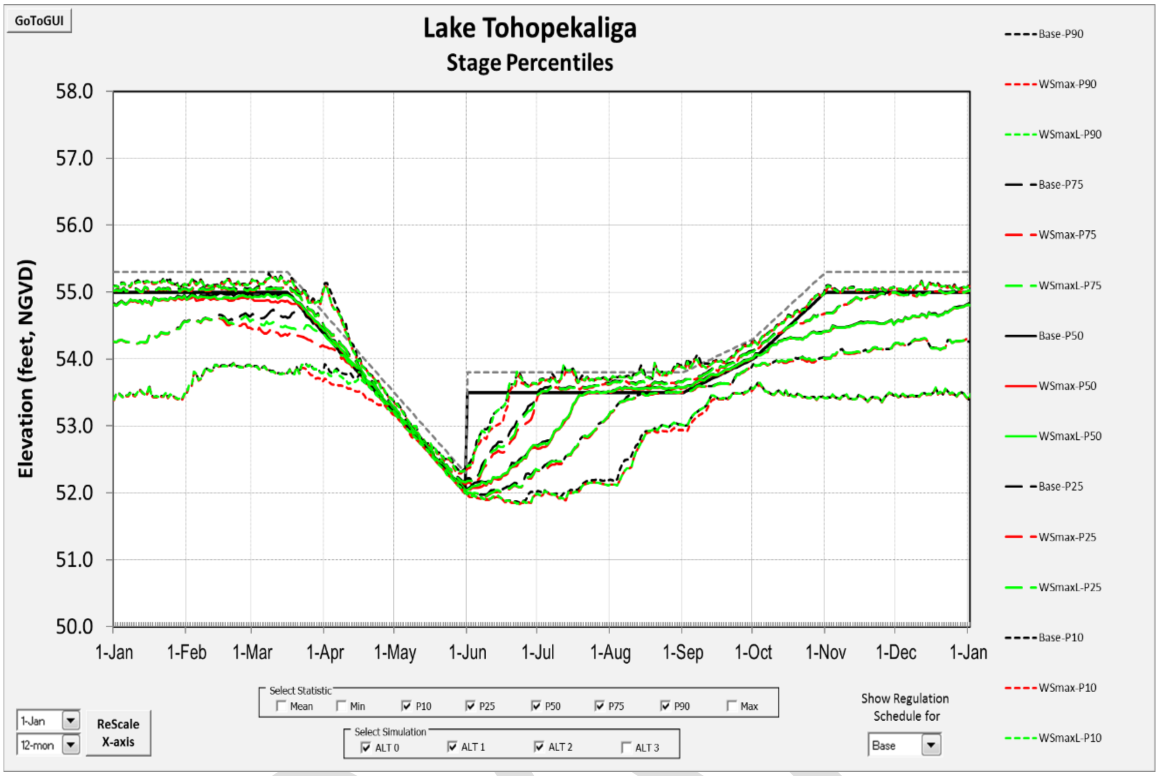

Figure 7-9. Lake Tohopekaliga stage percentiles for the Base, WSmax, and WSmaxL scenarios.

7.2.4.3 S-65 Annual Flow

A key criterion of the draft KRCOL Water Reservation rules is that the reduction in mean annual flow for the 41-year simulation period cannot exceed 5%[1]. This is a permitting criterion to evaluate proposed withdrawals. This criterion cannot be used for real-time operations to determine whether withdrawals can or cannot occur.

Figure 7-10 shows the mean annual flow for the WSmax scenario is exactly -5.0%. In fact, the max withdrawal capacity of 64 million gallons per day was determined by iteratively running the model until this limit was reached. If all future water supply withdrawals were to come from TOH, then they could not exceed a total of 64 million gallons per day. In reality, permitted withdrawals will be in various amounts and from any of the six lake systems that allow withdrawals, subject to the WRL and downstream constraints. This is one reason why the UK-OPS Model is needed as regulatory tool: to evaluate each proposed individual withdrawal in the context of the cumulative withdrawals that already have been permitted. Once the 5% limit is reached, no further withdrawals will be permitted.

[1] The 5% threshold was established from prior technical work (SFWMD 2009). The UK-OPS Model was used to determine the reduction in the mean annual flow as a result of withdrawals from a water use permit issued to Toho Water Authority (49-02549-W). This permit resulted in a 0.82% reduction in mean annual flow at S-65, thereby reducing the 5% threshold to 4.18%, which is reflected in the draft Water Reservation rules.

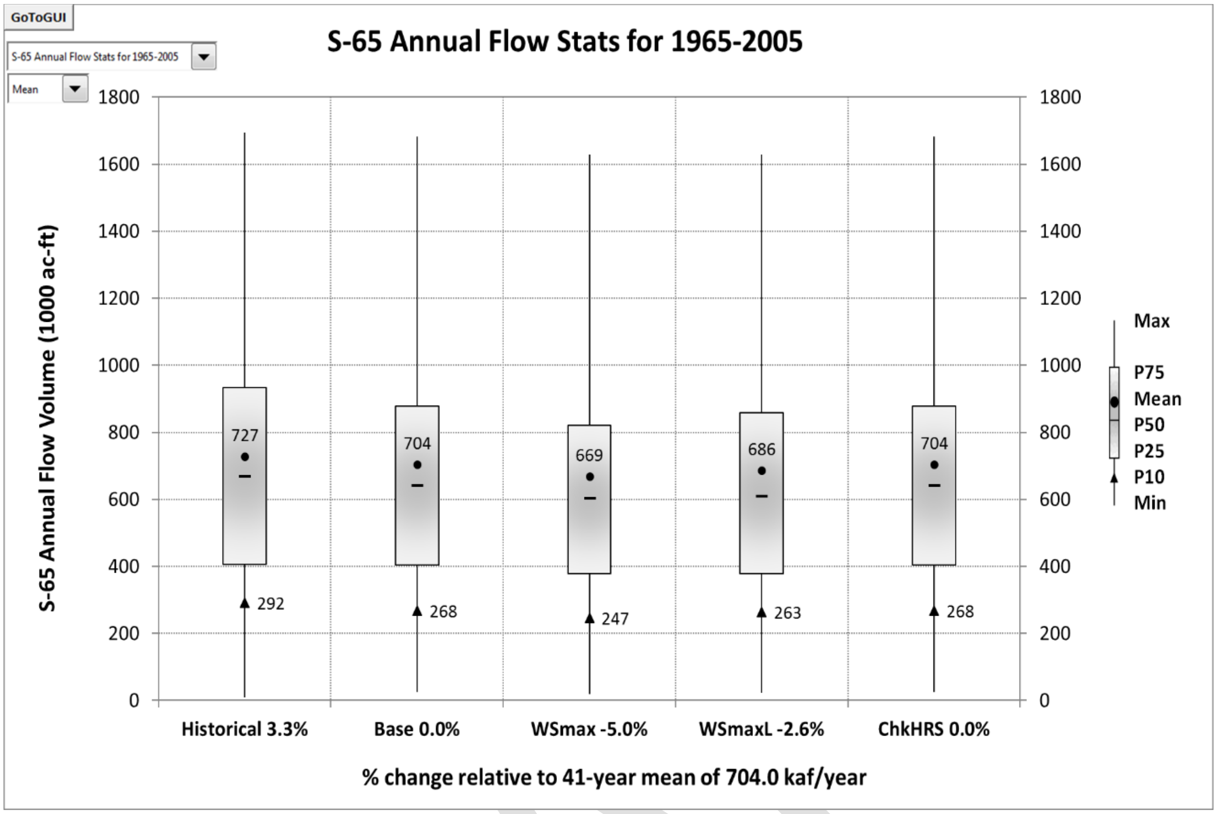

Figure 7-10. Mean annual flow at the S-65 structure under the WSmax scenario.

7.2.4.4 Water Supply Reliability

The simulated water supply reliability information for the WSmax and WSmaxL scenarios are shown in **Tables 7-1** and **7-2**, respectively. The target reliability (percent of time water supply withdrawals occur) was arbitrarily set at 70%. Users can change this target to match the level of performance desired for their particular project. The table summaries show the reliability under the WSmax scenario is 8 calendar years out of the 49 years simulated. The WSmaxL scenario has only 4 years out of the 49 years that meet or exceed the 70% reliability target. This result illustrates the impact from the Lake Okeechobee constraint. Additionally, a larger pump size can be tested to determine if supply targets can be better met. The reliability measures reflect the timing of withdrawals, but larger withdrawals could occur during the allowable days if they do not exceed the 5% cumulative limit. These scenarios can be tested with the UK-OPS Model.

Table 7-1. Lake Tohopekaliga water supply reliability for the WSmax scenario.

	Lake TOH Water Supply Reliability Table for WSmax															Percent of Time WS Withdrawal			
	No. of Days per Month with Lake Toho WS Withdrawals at 99.0 cfs (64.0 MGD)												Days	Vol(kaf)	AvgMGD	CalYear	WetSeas	DrySeas	WatYear
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan-Dec	Jan-Dec	Jan-Dec	Jan-Dec	May-Oct	Nov-Apr	May-Apr
1965	0	16	31	30	31	1	9	31	8	7	0	14	178	34.96	31.21	48.8%	47.3%		
1966	23	28	31	30	31	14	31	31	30	15	0	0	264	51.85	46.29	72.3%	82.6%	74.1%	58.4%
1967	0	16	31	30	31	0	8	31	20	1	0	0	168	33.00	29.46	46.0%	49.5%	50.9%	62.7%
1968	0	0	0	25	31	26	30	31	10	0	0	0	153	30.05	26.75	41.8%	69.6%	26.3%	31.7%
1969	19	28	31	30	31	0	0	0	6	27	21	22	215	42.23	37.70	58.9%	34.8%	65.6%	64.7%
1970	31	28	31	30	31	9	0	10	0	0	0	0	170	33.39	29.81	46.6%	27.2%	91.5%	62.2%
1971	0	0	3	28	31	0	0	0	0	0	0	0	62	12.18	10.87	17.0%	16.8%	29.2%	22.2%
1972	0	0	13	30	31	0	6	23	6	0	0	0	109	21.41	19.06	29.8%	35.9%	34.7%	20.2%
1973	0	26	31	30	31	3	0	13	29	11	0	0	174	34.18	30.51	47.7%	47.3%	55.7%	41.9%
1974	0	14	31	30	31	2	30	31	30	4	0	0	203	39.87	35.59	55.6%	69.6%	50.0%	44.4%
1975	0	0	21	30	31	0	0	27	19	11	2	0	141	27.70	24.72	38.6%	47.8%	38.7%	49.0%
1976	4	29	31	30	31	19	28	29	26	2	0	0	229	44.98	40.04	62.6%	73.4%	59.6%	50.3%
1977	5	28	31	30	31	1	0	5	13	2	0	3	149	29.27	26.13	40.8%	28.3%	59.0%	62.7%
1978	19	28	31	30	31	0	6	29	3	0	0	0	177	34.77	31.04	48.5%	37.5%	67.0%	44.7%
1979	4	28	31	30	31	1	0	0	27	7	0	0	159	31.23	27.88	43.6%	35.9%	58.5%	44.4%
1980	20	29	31	30	31	3	0	0	0	0	0	0	144	28.28	25.18	39.3%	18.5%	66.2%	48.1%
1981	0	0	0	0	11	4	0	3	21	0	0	13	52	10.21	9.12	14.2%	21.2%	5.2%	9.3%
1982	25	28	31	30	31	30	31	31	28	13	0	0	278	54.60	48.74	76.2%	89.1%	74.5%	45.5%
1983	7	28	31	30	31	13	20	31	28	13	7	15	254	49.89	44.54	69.6%	73.9%	59.9%	71.2%
1984	31	29	31	30	31	3	27	30	4	0	0	0	216	42.43	37.77	59.0%	51.6%	81.7%	76.2%
1985	0	0	9	30	31	0	0	30	27	10	0	0	137	26.91	24.02	37.5%	53.3%	33.0%	36.7%
1986	30	28	31	30	31	0	0	23	12	0	0	0	185	36.34	32.44	50.7%	35.9%	70.8%	59.5%
1987	29	28	31	30	31	2	0	0	0	0	19	29	199	39.09	34.89	54.5%	17.9%	70.3%	50.4%
1988	18	29	31	30	30	0	0	12	26	0	2	28	206	40.46	36.02	56.3%	37.0%	87.3%	51.6%
1989	11	11	29	30	31	0	0	18	17	6	0	0	153	30.05	26.83	41.9%	39.1%	67.0%	49.0%
1990	0	5	31	30	31	0	0	20	0	0	0	0	117	22.98	20.51	32.1%	27.7%	45.8%	37.8%
1991	0	2	29	30	31	30	31	31	13	16	0	0	213	41.84	37.35	58.4%	82.6%	43.4%	30.7%
1992	0	22	31	30	31	13	20	27	29	19	6	27	255	50.09	44.59	69.7%	75.5%	53.5%	64.2%
1993	29	28	31	30	31	5	0	0	10	0	0	0	164	32.21	28.76	44.9%	25.0%	85.8%	79.5%
1994	2	28	31	30	31	23	25	31	30	16	28	31	306	60.10	53.65	83.8%	84.8%	57.5%	37.5%
1995	30	28	31	30	31	0	5	31	27	28	13	10	264	51.85	46.29	72.3%	66.3%	98.6%	91.5%
1996	30	29	31	30	31	30	23	21	19	5	0	0	249	48.91	43.54	68.0%	70.1%	81.7%	72.4%
1997	7	28	31	30	31	4	12	29	5	0	1	28	206	40.46	36.12	56.4%	44.0%	59.9%	61.6%
1998	31	28	31	30	31	2	0	0	5	3	0	0	161	31.62	28.23	44.1%	22.3%	84.9%	63.0%
1999	0	26	31	30	31	1	13	27	14	30	26	12	241	47.34	42.26	66.0%	63.0%	55.7%	35.1%
2000	18	29	31	30	31	0	0	9	7	0	0	0	155	30.45	27.10	42.3%	25.5%	83.1%	71.6%
2001	0	0	0	26	31	3	16	27	30	5	0	0	138	27.11	24.20	37.8%	60.9%	26.9%	20.0%
2002	0	24	31	30	31	22	31	31	30	3	12	28	273	53.62	47.87	74.8%	80.4%	54.7%	54.0%
2003	31	28	31	30	31	25	31	31	21	8	2	16	285	55.98	49.97	78.1%	79.9%	90.1%	84.4%
2004	21	29	31	30	31	0	12	29	30	31	26	12	282	55.39	49.31	77.0%	72.3%	75.1%	75.4%
2005	30	28	31	30	31	30	29	31	9	7	27	21	304	59.71	53.30	83.3%	74.5%	88.7%	79.5%
2006	10	28	31	30	31	0	2	12	21	0	0	0	165	32.41	28.93	45.2%	35.9%	84.0%	77.8%
2007	0	26	31	30	31	20	21	20	14	8	0	1	202	39.68	35.42	55.3%	62.0%	55.7%	41.9%
2008	10	29	31	30	31	0	8	30	23	4	0	0	196	38.50	34.27	53.6%	52.2%	62.0%	58.7%
2009	0	19	31	30	31	30	31	31	25	1	0	11	240	47.14	42.08	65.8%	81.0%	52.4%	48.2%
2010	16	28	31	30	31	30	19	2	0	0	0	0	187	36.73	32.79	51.2%	44.6%	69.3%	72.6%
2011	0	20	31	30	31	0	9	31	25	26	20	3	226	44.39	39.63	61.9%	66.3%	52.8%	44.7%
2012	4	27	31	30	31	6	28	29	29	13	0	0	228	44.78	39.87	62.3%	73.9%	68.5%	64.8%
2013	0	14	31	30	31	25	31	31	28	3	0	0	224	44.00	39.28	61.4%	81.0%	50.0%	57.8%
MEANS																			
48YR	11	21	27	29	31	9	13	21	17	7	4	7	197	38.71	34.53	54.0%	52.9%	61.5%	54.0%
41YR	12	21	27	29	30	8	12	21	16	7	5	8	195	**38.27**	**34.14**	**53.4%**	51.1%	61.9%	53.4%

SUMMARY STATISTICS	CalYear	WetSeas	DrySeas	WatYear
No. of years used for stats	49	49	48	48
Years used for stats	'65-'13	'65-'13	'66-'13	'66-'13
# Yrs with WS duration > 70%	8	15	16	11
Annual Exceedance Frequency	16.3%	30.6%	33.3%	22.9%
Return Period (1-in-Nyrs)	6.1	3.3	3.0	4.4

Table 7-2. Lake Tohopekaliga water supply reliability for the WSmaxL scenario.

Lake TOH Water Supply Reliability Table for WSmaxL																Percent of Time WS Withdrawal			
	No. of Days per Month with Lake Toho WS Withdrawals at 99.0 cfs (64.0 MGD)												Days	Vol(kaf)	AvgMGD	CalYear	WetSeas	DrySeas	WatYear
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan-Dec	Jan-Dec	Jan-Dec	Jan-Dec	May-Oct	Nov-Apr	May-Apr
1965	0	16	29	0	0	0	0	0	0	0	0	0	45	8.84	7.89	12.3%	0.0%		
1966	1	28	30	11	0	4	31	31	30	15	0	0	181	35.55	31.74	49.6%	60.3%	33.0%	19.2%
1967	0	16	15	0	0	0	0	0	0	0	0	0	31	6.09	5.44	8.5%	0.0%	14.6%	38.9%
1968	0	0	0	0	0	2	30	31	10	0	0	0	73	14.34	12.76	19.9%	39.7%	0.0%	0.0%
1969	0	0	22	26	22	0	0	0	6	27	21	22	146	28.68	25.60	40.0%	29.9%	33.0%	33.2%
1970	31	28	31	30	31	9	0	10	0	0	0	0	170	33.39	29.81	46.6%	27.2%	91.5%	59.7%
1971	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	13.7%
1972	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1973	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1974	0	0	0	0	0	0	0	29	30	4	0	0	63	12.37	11.05	17.3%	34.2%	0.0%	0.0%
1975	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	17.3%
1976	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1977	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1978	0	0	0	0	0	0	0	29	3	0	0	0	32	6.29	5.61	8.8%	17.4%	0.0%	0.0%
1979	4	28	31	30	31	1	0	0	27	7	0	0	159	31.23	27.88	43.6%	35.9%	58.5%	34.2%
1980	20	29	31	30	31	3	0	0	0	0	0	0	144	28.28	25.18	39.3%	18.5%	66.2%	48.1%
1981	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	9.3%
1982	0	0	0	0	0	1	31	31	28	13	0	0	104	20.43	18.24	28.5%	56.5%	0.0%	0.0%
1983	7	28	31	30	31	13	20	31	28	13	7	15	254	49.89	44.54	69.6%	73.9%	59.9%	54.8%
1984	31	29	31	30	31	3	27	30	4	0	0	0	216	42.43	37.77	59.0%	51.6%	81.7%	76.2%
1985	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	26.0%
1986	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1987	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1988	5	28	31	16	0	0	0	0	0	0	0	0	80	15.71	13.99	21.9%	0.0%	37.6%	21.9%
1989	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1990	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
1991	0	0	0	0	0	0	0	30	13	16	0	0	59	11.59	10.35	16.2%	32.1%	0.0%	0.0%
1992	0	20	0	0	0	0	22	27	29	19	6	27	150	29.46	26.23	41.0%	52.7%	9.4%	21.6%
1993	29	28	31	30	31	5	0	0	0	0	0	0	154	30.25	27.00	42.2%	19.6%	85.8%	67.9%
1994	1	28	31	20	31	23	25	31	30	16	28	31	295	57.94	51.73	80.8%	84.8%	52.4%	31.8%
1995	30	28	31	30	31	0	5	31	27	28	13	10	264	51.85	46.29	72.3%	66.3%	98.6%	91.5%
1996	30	29	31	30	24	30	23	16	0	0	0	0	213	41.84	37.25	58.2%	50.5%	78.4%	72.4%
1997	0	0	0	0	0	0	0	0	2	0	0	21	23	4.52	4.03	6.3%	1.1%	0.0%	25.5%
1998	31	28	31	30	31	2	0	0	1	4	0	0	158	31.03	27.70	43.3%	20.7%	81.1%	39.2%
1999	0	26	26	0	0	0	8	7	14	30	26	12	149	29.27	26.13	40.8%	32.1%	24.5%	24.7%
2000	18	29	31	10	0	0	0	0	0	0	0	0	88	17.28	15.39	24.0%	0.0%	59.2%	50.5%
2001	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	0.0%
2002	0	25	2	0	0	0	7	31	30	3	0	21	119	23.37	20.87	32.6%	38.6%	12.7%	7.4%
2003	31	28	31	22	12	27	31	31	21	8	2	16	260	51.07	45.59	71.2%	70.7%	68.4%	55.9%
2004	21	29	23	0	0	0	0	0	16	31	26	12	158	31.03	27.63	43.2%	25.5%	42.7%	60.4%
2005	30	25	31	30	22	30	29	31	9	7	27	21	292	57.35	51.20	80.0%	69.6%	83.0%	55.1%
2006	10	28	31	30	4	0	0	0	0	0	0	0	103	20.23	18.06	28.2%	2.2%	71.2%	75.3%
2007	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	1.1%
2008	0	0	0	0	0	0	0	4	23	4	0	0	31	6.09	5.42	8.5%	16.8%	0.0%	0.0%
2009	0	0	0	0	0	0	0	31	25	1	0	0	57	11.20	9.99	15.6%	31.0%	0.0%	8.5%
2010	0	11	31	30	31	30	19	2	0	0	0	0	154	30.25	27.00	42.2%	44.6%	48.6%	35.3%
2011	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.0%	0.0%	0.0%	22.5%
2012	0	0	0	0	0	0	0	0	29	13	0	0	42	8.25	7.34	11.5%	22.8%	0.0%	0.0%
2013	0	14	31	30	31	25	31	31	28	3	0	0	224	44.00	39.28	61.4%	81.0%	50.0%	32.1%
MEANS																			
48YR	7	12	14	10	9	4	7	11	9	5	3	4	96	18.80	16.77	26.2%	24.6%	27.9%	26.2%
41YR	8	13	14	10	9	4	7	11	9	6	4	5	100	**19.55**	**17.44**	**27.3%**	24.6%	29.7%	27.3%

SUMMARY STATISTICS	**CalYear**	**WetSeas**	**DrySeas**	**WatYear**
No. of years used for stats	**49**	**49**	**48**	**48**
Years used for stats	**'65-'13**	**'65-'13**	**'66-'13**	**'66-'13**
# Yrs with WS duration > 70%	**4**	**4**	**8**	**4**
Annual Exceedance Frequency	**8.2%**	**8.2%**	**16.7%**	**8.3%**
Return Period (1-in-Nyrs)	**12.3**	**12.3**	**6.0**	**12.0**

8 SUMMARY AND RECOMMENDATIONS

This section summarizes the strengths and limitations of the UK-OPS Model and suggests future enhancements to improve model accuracy and utility. The UK-OPS Model uses a simple water balance approach to simulate water levels and discharges for the primary hydrologic components of the larger lake systems in the UKB. The model was developed to quickly test alternative operating strategies for KCH, TOH, and ETO specifically. It was later modified to serve as a water use permit evaluation tool to assess the effects of proposed water supply withdrawals, subject to the draft KRCOL Water Reservation rule criteria. Original model development was done expeditiously; user-friendly interfaces and documentation beyond comments within the worksheets were not included in the initial development effort. The need to document and peer review the UK-OPS Model arose during the planning phase of the draft KRCOL Water Reservation rules.

This report describes the purpose, utility, and technical details of the UK-OPS Model. The report is not a users' guide, but it is prerequisite reading for analysts who want to use the model. Included in this report are details on model structure, inputs and outputs, and model validation. Two applications of the UK-OPS Model were described in this report: 1) seasonal operations planning, including the SFWMD's monthly position analysis; and 2) testing the effects of hypothetical surface water withdrawals on the draft KRCOL Water Reservation rule criteria. These applications illustrate appropriate uses of the UK-OPS Model.

Strengths of the UK-OPS Model include the ability to rapidly test alternative operating ideas (i.e., run time of 4 minutes versus days or even weeks for more detailed models), ease of use in a readily available environment (i.e., Microsoft Excel®), broad range of options for specifying alternative operations, immediate updating of the outputs and performance metrics, and flexibility to modify the Microsoft Excel® worksheets to add additional features and/or performance summary graphics.

Model users have made the following comments regarding the usefulness of the UK-OPS Model:

- Key strengths of the UK-OPS Model are its quick simulation time and ability to immediately visualize outputs.
- Time-series plots provide a useful way to visualize and confirm the input operations are being correctly simulated.
- Water budgets are a helpful way to quickly confirm mass is conserved.
- The S-65 mean annual discharge and water supply reliability summaries enable rapid assessment of the effects of proposed water supply withdrawals on the draft KRCOL Water Reservation rule criteria.

Limitations of the UK-OPS Model include the potential need for routing computations for the small lakes, lack of extensive documentation within the workbook, and dependence on another model or historical data to generate the boundary inflows.

There are several areas where the UK-OPS Model may be exploited by more users with varying levels of expertise in water management, hydrology, and hydraulics. Some initial recommendations are listed below, and additional recommendations are expected based on input from internal and external peer reviewers.

1. Extend the simulation period by updating the inputs using available historical data and/or outputs from detailed regional hydrologic models.

2. Simplify the effort required to perform simulation period extensions by leveraging additional Microsoft Excel® features (e.g., making range names more dynamic).

3. Improve the GUI of the UK-OPS Model to appeal to more users and enable better utility of the model.
4. Expand the instructions for users within the model. Online documentation and built-in tutorials would greatly enhance usability of the model.

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ATTACHMENT

SAMPLE EMAIL COMMUNICATION OF AUGUST 2019
UK-OPS POSITION ANALYSIS

From: Neidrauer, Calvin
Sent: Thursday, August 01, 2019 5:42 PM
To: Morancy, Danielle <dmorancy@sfwmd.gov>
Cc: Wilcox, Walter <wwilcox@sfwmd.gov>; Barnes, Jenifer <jabarne@sfwmd.gov>; Bousquin, Steve <sbousqu@sfwmd.gov>; Glenn, Lawrence <lglenn@sfwmd.gov>; Kirkland, Suelynn <skirklan@sfwmd.gov>; Anderson, H. David <dander@sfwmd.gov>; Mohottige, Dillan <dmohotti@sfwmd.gov>; Godin, Jason <jgodin@sfwmd.gov>
Subject: August PA UK-OPS Simulation Assumptions

FYI:

The UK-OPS Model simulation for the August PA was completed today (01-August). Operations assumptions for Lake KCH changed from the June PA, and were informed by the 2019 wet season discharge plan developed by the SFWMD with input from the USFWS & FFWCC. Assumptions for TOH & ETO were consistent with last month; the spring fish & wildlife (F&W) recessions are assumed to start on 15-Jan-2019 at 0.4 feet below the regulation schedules.

Results are to be used as input to the corresponding SFWMM simulation. A copy of the Excel workbook is available in the following server folder:

\\ad.sfwmd.gov\dfsroot\data\hesm_pa\PA_BASE_DIR\PA\UK-OPSmodel\

Filename = UK-OPS(v3.12)_2019AugPA.xlsm

Use the **ALT2** simulation output (Run name = **AugPA**).

The simulated stages and flows are in the **ALT2 worksheet tab**.

Initial (31-July) Conditions:

E. Lake Toho: 56.29 feet, NGVD (TOHOEE+)

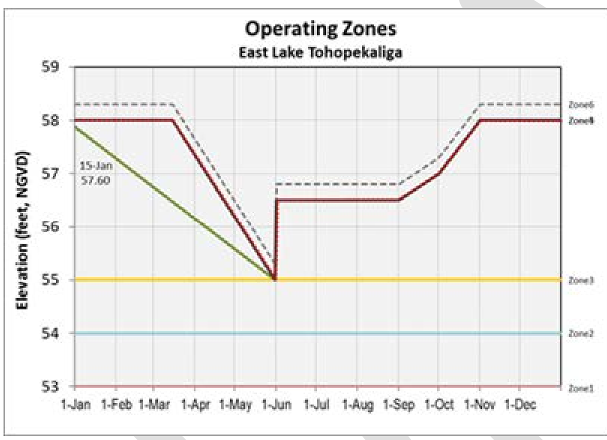
Lake Toho: 53.48 feet, NGVD (LTOHOW AVG)

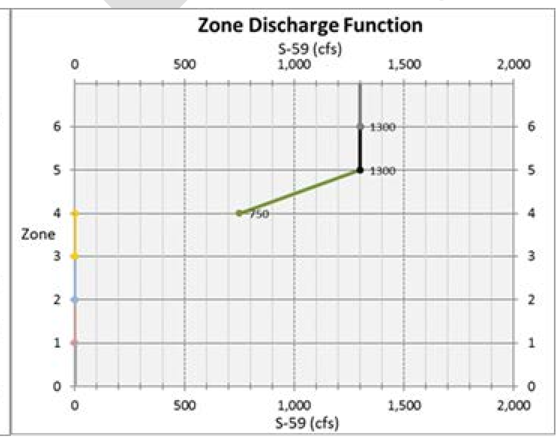
Lake KCH: 50.20 feet, NGVD (LKISS AVG)

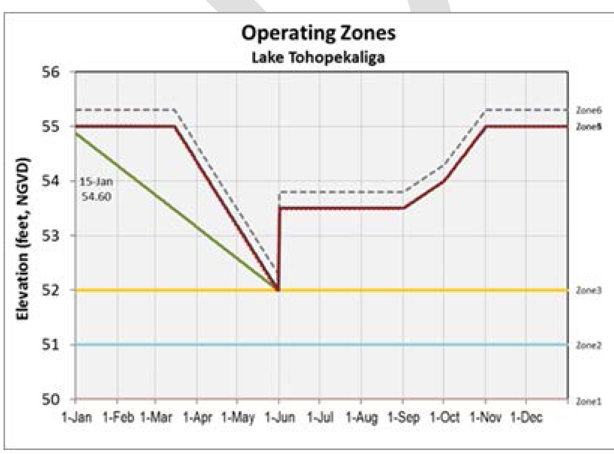
For the August 2019 Position Analysis the Upper Kissimmee Operations Screening (UK-OPS) Model was used to simulate water levels and releases from Lakes Kissimmee-Cypress-Hatchineha, Tohopekaliga, and East Lake Tohopekaliga. The UK-OPS Model assumptions for operations are listed below. Details regarding model version features are listed at the end of this e-mail.

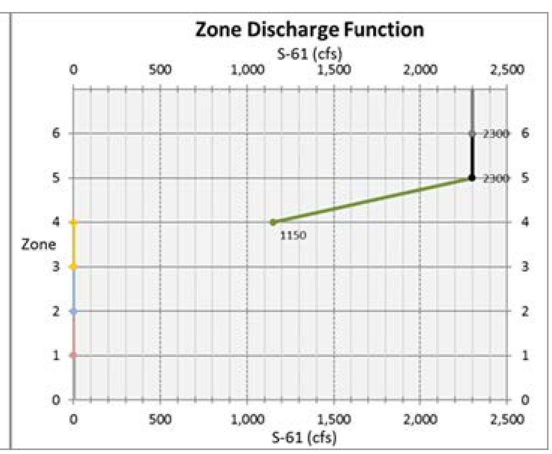
UK-OPS Model assumptions for the August-2019 PA:

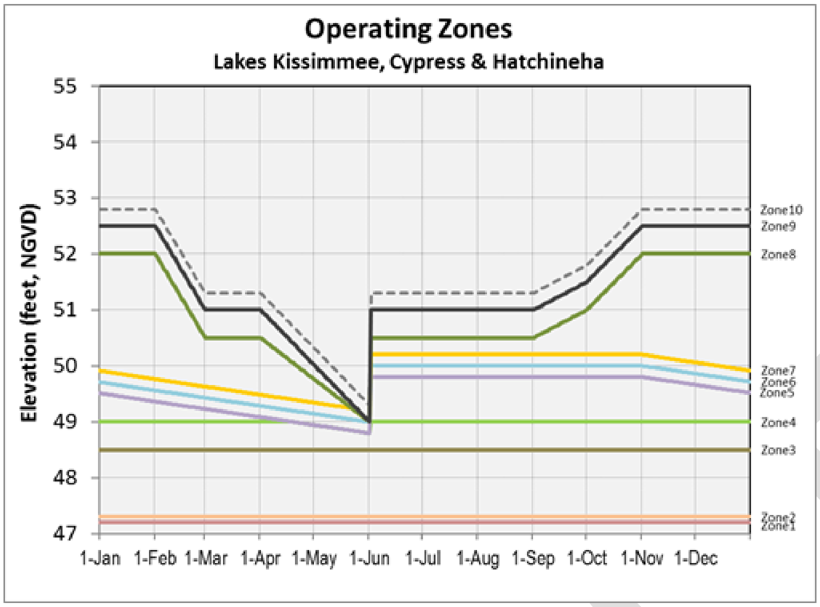
1. Hydrology (lake inflows) based on historical/observed stage and flow data from DBHYDRO (same assumption since Jan 2016).
2. Regulation of Lakes Toho and East Lake Toho according to the standard Regulation Schedules with spring recession operations approximated as shown below. Recession ops start 15-Jan. Note the red dotted lines represent the standard regulation schedule Zone A line.
3. Regulation of Lakes Kissimmee, Cypress and Hatch according to 2019 wet season operations designed to achieve desired river flows and lake stage recession rates. See graphic of discharge plan below. Rate of change limits for S-65A flows shown below were set in May 2019. The rate of change limits apply for stages below Zone A of the KCH schedule.
4. Starting with the Nov-2017 PA, KCH simulated outflows were measured at S-65A. So S-65 releases are made with consideration of Pool A runoff contribution to S-65A.

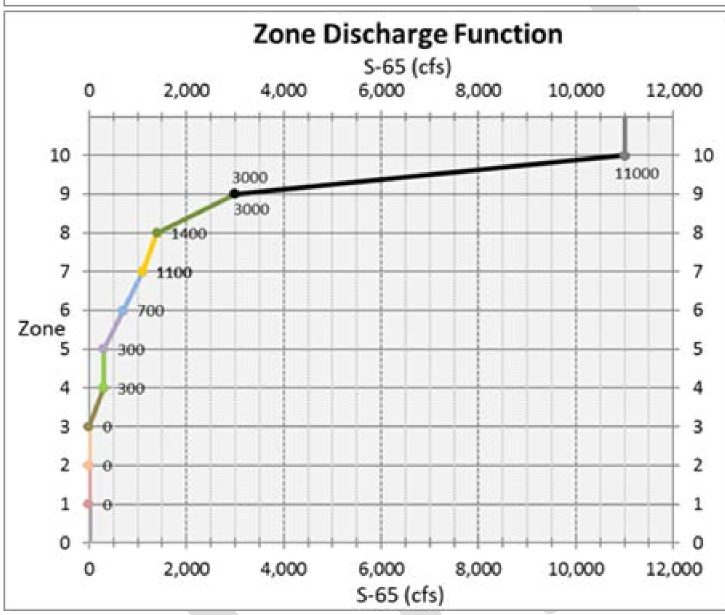









Operating Zones
Lakes Kissimmee, Cypress & Hatchineha
Elevation (feet, NGVD)
55
54
53
52
51
50
49
48
47
1-Jan
1-Feb
1-Mar
1-Apr
1-May
1-Jun
1-Jul
1-Aug
1-Sep
1-Oct
1-Nov
1-Dec
Zone10
Zone9
Zone8
Zone7
Zone6
Zone5
Zone4
Zone3
Zone2
Zone1


Zone Discharge Function
S-65 (cfs)
0
2,000
4,000
6,000
8,000
10,000
12,000
Zone
10
9
8
7
6
5
4
3
2
1
0
11000
3000
3000
1400
1100
700
300
300
0
0
0
S-65 (cfs)

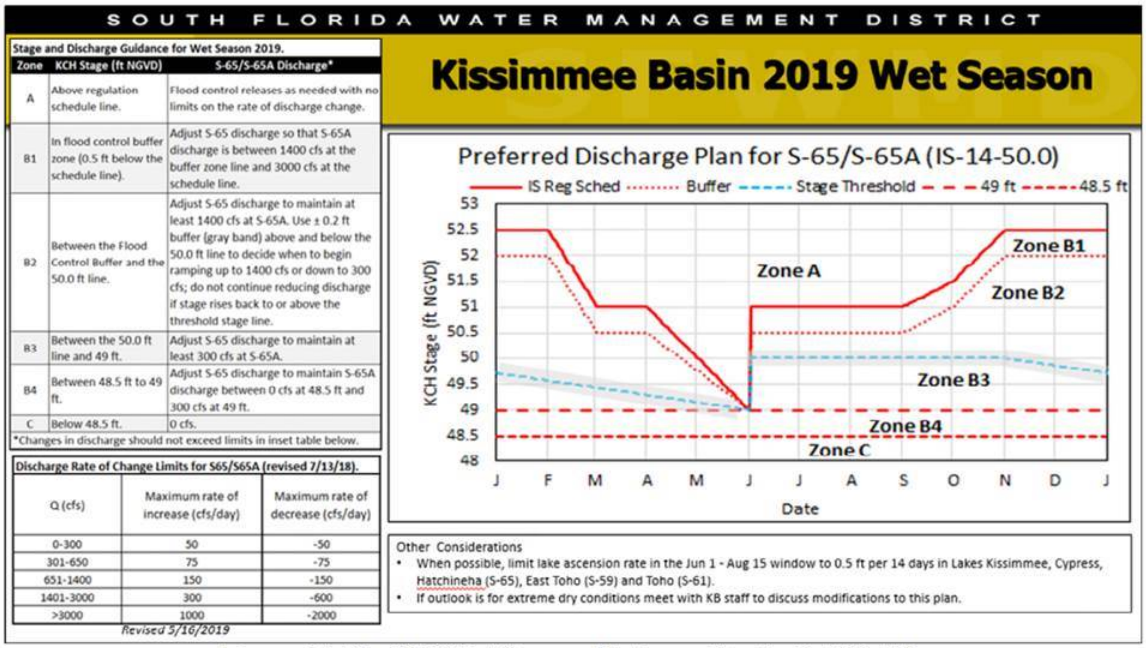


Figure 11. The 2019 Wet Season Discharge Plan for S-65/S-65A.

UK-OPS Model Version notes:

The November, 2015 investigation of the UKISS Model output (2007 version) indicated a significant underestimation of S-65 flows for the 1997-98 very wet period. So while SFWMD H&H Bureau staff efforts continue toward improving the modeling tools for the Kissimmee basins, the intermediate solution is to continue to use the UK-OPS Model with the lateral lake inflows computed using observed data.

Version 3.12 of the UK-OPS Model was used beginning with the July 2019 PA. V3.12 includes features to allow testing alternative operations and water reservation lines. These features are not used for the current PA simulations.

Version 3.10 of the UK-OPS Model was used beginning with the January 2019 PA. Version 3.10 includes options to simulate lake stage recession operations for lakes KCH, TOH, and ETO. The new logic determines daily releases necessary to achieve a user-specified stage recession rate. Options for KCH include constraining the S-65 release rates-of-change by the user-specified release rate limits. See the Notes page and comments in the routing worksheets for more detail. These changes are not used for current PA simulations.

Version 3.07 of the UK-OPS Model was used beginning with the March 2018 PA. Version 3.07 includes new features to enable testing alternative strategies for the Kissimmee Reservation, particularly a water reservation line for Lakes KCH (to limit upstream withdrawals). Other changes include separation of the WRL zone specification from the regulation schedules. See the Notes tab for further detail. These changes do not affect the position analysis simulations.

Version 3.05 of the UK-OPS Model was used beginning with the March 2017 PA. Version 3.05 includes additional capability to view individual year stage and discharge hydrographs for the three primary lake systems (KCH, TOH, and ETO). Use the buttons in the 5th column of the PM & Indicator buttons to access the new hydrographs. Thanks to Naiming Wang for this addition to the model.

Cal

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APPENDIX D:
PEER-REVIEW REPORTS FOR THE UK-OPS MODEL

SFWMD UK-OPS Model Report

By Mark H. Houck

November 11, 2019

Overview:

SFWMD requested an external scientific peer review of the UK-OPS model and documentation in late Sep 2019. After a preliminary examination of the model and the documentation, written comments were submitted to SFWMD on Oct 14, 2019, with a revision on Oct 15, 2019. SFWMD held a day-long workshop/teleconference on Oct 23, 2019, to provide a live overview of the model, demonstrate its use, and address all comments and questions from the peer reviewers and the public.

The next step is submission of a final report from the peer reviewers. This document is that final report. It comprises two sections. The first is organized in response to five questions posed by the SFWMD. The second contains several recommendations for enhancing the UK-OPS model and documentation.

Section 1: Five SFWMD Questions

Question 1: Is the water budget approach technically sound for its intended purpose, which is to enable simulation of alternative release strategies and potential water supply withdrawals?

> The UK-OPS model is designed as a coarse, or screening, simulation model to allow a variety of release strategies or policies to be assessed quickly. The approach is technically sound, and satisfies the standards of practice. It is an appropriate tool to assess alternative release strategies and potential water supply withdrawals at a coarse level.
>
> The model may be used in two different modes. Long-term simulations (49 years of daily operations) may be made to consider long-term operating policies. Or the model can be run to consider shorter-term decisions which the developers call "position analysis". In this case, the current conditions of the system are used as initial conditions for 49 one-year simulations where each one-year simulation assumes one of the 49 historical year's flows as input. Both modes are valuable to address a variety of operating decisions in the long-term and short-term.
>
> The model is similar in principle to other state-of-the-practice water resource screening models or modeling systems that are used to assess operating strategies or policies. The implementation of the principles is well executed, thorough, and has resulted in a useful tool for assessing options in the Kissimmee Basin region of the SFWMD.

The model's use is limited by several assumptions made by the developers. The documentation identifies these limitations but at present the model should be exercised only by professionals who are familiar with the model's development, limitations, and use. Further discussion of these assumptions and limitations is provided in section two.

Question 2: Is the water budget approach applied correctly for the three large lake systems that use the hydrologic routing computations, namely Lakes KCH, Tohopekaliga, and East Tohopekaliga?

The water budget approach is correctly applied to the three large lake systems in the UK-OPS screening model. The simplification of the hydraulics of the system is reasonable and useful in establishing a screening model for testing of various operating policies.

The simplification of the other inputs to the lakes (i.e. the WNI+RF terms) is reasonable in this screening model. However, the greater the variance of tested operations is from historical operations, the greater the opportunity for errors to occur. More details on this issue are provided in section 2.

Question 3: Does the draft technical documentation adequately describe the model's fundamental features, basic capabilities and limitations, and the algorithms used to simulate lake releases and water levels? Are there any specific suggestions to improve the description of the model?

The draft technical documentation does adequately describe the model principles. It is not intended to be a users' manual and it does not serve that purpose. It does describe the basic approach to constructing the model, the justification for this approach, its principle components, the potential uses of the model, and two examples illustrating those uses.

All technical documents have the potential for improvement. Several suggestions for improving this one are provided in section 2.

Question 4: Is the model suitable for simulating alternative operating criteria for East Lake Tohopekaliga, Lake Tohopekaliga, and Lakes Kissimmee, Cypress, and Hatchineha?

Based on the review of the documentation and spreadsheet model, and participation in the one-day workshop, the model is suitable for assessing alternative operating policies for the three large lakes. Appropriate use of the UK-OPS model in its current form requires a trained expert, but those individuals may use the model reasonably to examine alternative operating policies and criteria for the three large lakes.

Question 5: Is the model suitable for evaluating: (1) individual and cumulative water supply withdrawals, (2) the associated Kissimmee Basin Water Reservation criteria

limitations on those withdrawals, and (3) the effects of water supply withdrawals on the 5% maximum reduction criteria at S65?

> The UK-OPS screening model is designed to support assessment of these three specific operations, as well as others. The model meets state-of-the-practice standards, is based on reasonable assumptions, uses appropriate data sets, and is implemented in an Excel spreadsheet thereby making the model potentially accessible to an array of users. All models must be exercised with care, considering the embedded assumptions. Therefore, the UK-OPS model in its present form requires use by a trained expert familiar with the model, its capabilities, and its limitations.

Section 2: Comments on the UK-OPS Screening Model and Documentation

1. Implementation

a. The UK-OPS model is a coarse simulation model. It is intended as a tool that may quickly assess a variety of alternative operating strategies or policies. The complexity of the programing in the spreadsheet is notable, and the complex model is remarkably computationally efficient.

b. The development of a screening simulation model in Excel makes the tool potentially accessible to an array of users. Because Excel is so widely used and understood, it allows for the relatively easy examination of model's components and structure, and it may support well the evolution of the model in the future.

c. UK-OPS supports continuous simulation over a 49-year historical sequence; or position analysis where 49 one-year simulations based on historical conditions are run, all with a starting point of current basin conditions. This provides reasonable flexibility and the opportunity to address a variety of questions ranging from long-range policy changes (using continuous simulation) to short-term operations-planning (using position analysis). These options are important and in line with standards of practice.

d. The documentation report is appropriately described as an overview and not a detailed users' manual. The documentation report is well-written, thorough, and useful for understanding the UK-OPS model and its application. However, the model currently requires a trained expert to use the model appropriately so that its assumptions, strengths, and limitations are fully incorporated in any assessment.

2. Recommendations / Limitations / Enhancements

a. UK-OPS Model – the spreadsheet

i. The UK-OPS model was developed as a screening or coarse model that can be employed quickly to get high-level guidance on the impacts of various policy or operating alternatives. This is reasonable and standard practice. The issue is under what conditions is the screening or coarse model reliable/reasonable/acceptable?

ii. The model uses a daily time step with historical inflows as inputs. This is reasonable, and the practice is common, but it assumes stationarity of

the flows when assessing future operations. Land use changes, changes to the flow network, or climate change during the last 60 years may have resulted in the historical flows being non-stationary. Therefore, it may be useful to test the assumption of stationarity to refine the model and enhance confidence in its use to assess future operations. Common approaches to assess stationarity include:

1. Data visualization. This typically means plotting the time series, looking at the plots, and visually attempting to discern any obvious trends.
2. Statistics visualization. Sometimes seeing trends (the signal versus the noise) in a time series is easier if statistics are plotted instead of the raw data. For example, a plot of an annual or multi-year moving average of the data, or a plot of the autocorrelation factor for different lags may make it possible to see the trends (signal) more easily.
3. Statistical tests. Finally, there is a rich literature on more elaborate statistical tests for stationarity (e.g. Dickey Fuller test or the Kwiatkowski-Phillips-Schmidt-Shin—KPSS test). These are quite common and may be used if warranted.

iii. The model uses a 49-year historical record (1965 – 2013) of daily flows as the basis for simulation. Obviously, additional historical data are available for more recent years (2013 – present). While there are only a few extra years of data available, they may be important for the modeling effort. They may contain critical events or they may reflect the current hydrologic regime which may differ from earlier hydrologic data if the system is non-stationary. In conjunction with a study of the stationarity of the historical data, a plan to incorporate additional, recent hydrologic data would be appropriate.

iv. The hydrology and hydraulics of this complex system have been simplified with the goal of developing a screening model that adequately represents the hydrologic and hydraulic processes and allows rapid testing of a variety of operating strategies. These simplifications are reasonable under current conditions, and the model is appropriate to screen alternative strategies quickly.

v. There are some concerns that should be considered as model use increases and the range of operation policies assessed expands. For example, the modeling of structures S59 and S61 assumes that the maximum allowable gate openings (MAGO) and maximum permissible heads (MPH) are not considered (pages 18 and 22-23). This appears to be reasonable at present but as the model evolves and the range of

operating policies tested in the model expands, these assumptions may be problematic. Another example is the assumption in the model of the lumping of historical values of some inflows (WNI—watershed net inflow) and rainfall values (RF) into a single deterministic input series to the model (WNI+RF). The potential problem is that as the operating policies being tested in the model deviate from the historical operations, the WNI+RF values resulting from the simulated operations may deviate from the historical WNI+RF values used in the model. The surface and ground water systems in the region are linked hydraulically and it is possible that operations may affect the WNI+RF values. This may result in the model not representing the actual system as well as desired.

vi. There are several ways to address the concern that the UK-OPS model has assumptions built-in that may limit its usefulness.

1. For example, the UK-OPS model could be used to identify likely solutions to a particular problem or issue quickly, and then a more detailed or refined model (e.g. an appropriate MIKE model from DHI), could be used to verify those solutions are correct. This appropriately uses a quick but coarse tool like the UK-OPS model to screen alternatives, and confirms the findings with a more refined but computationally-burdensome model.

2. Or, some sensitivity analysis could be undertaken. For example, if the question is whether a withdrawal of 5% from one of the lakes is acceptable, then the UK-OPS model could be run multiple times, first with the historical WNI+RF values, then with more conservative WNI+RF values, and then with less conservative WNI+RF values. The point is to bracket the range of possible, actual WNI+RF values in the three simulations. If all three runs conclude that the policy of a 5% withdrawal is acceptable, then there is greater confidence in the results. If the runs result in differing conclusions, then a more refined model (e.g. an appropriate MIKE model) may be used to clarify the conclusion.

3.

vii. On page 2 of the draft documentation, this statement is made: "The model does not contain limits on parameter values or warnings to caution users when results may not be realistic; thus the model should be used with substantial professional judgement. Future development efforts may expand and improve the user-interfaces. To enable a good understanding of the UK-

OPS Model, reading this document is a prerequisite. To use the UK-OPS Model in its current form, interactive training may be necessary." It may be wise to put a comparable disclaimer and warning prominently on the spreadsheet model to ensure that inappropriate use is limited. Perhaps, a sheet titled "Read Me First" with this warning statement should be added to the spreadsheet.

viii. Many of the cells in the UK-OPS spreadsheet have comments that define a term or describe the action needed. These comments are highly useful. As the model evolves, analogous comments could be added to more cells, and other more global comments (e.g. in text boxes) could be added to support a model user. If use of the model is to be expanded beyond the trained experts at SFWMD, the spreadsheet will need further documentation, either within the spreadsheet or a separate users' manual, and additional programming to ensure inappropriate use (e.g. modification of equations, or entry of out-of-limits data or parameters) is limited.

b. UK-OPS Model – the documentation

i. As stated above, the draft document associated with the UK-OPS model is not a users' manual but does provide an overview of the model and its use. It fulfils this purpose well. It is well organized, well written, clear, and concise.

ii. Nonetheless, all documents may be improved and clarified. Here are some minor suggestions:

1. On page 27, first paragraph, Zone 10 is described as a 0.3 ft offset from Zone A. The Zone A line is shown as Zone 9 on Fig 3.4.4. This should be clarified.
2. On page 27, the penultimate paragraph, is somewhat unclear. It would be useful to state that Zone X is the area between the lines labeled Zone X and Zone X+1.
3. On page 28, last paragraph, the terms "C-38" and "Pool A" are used interchangeably. It is worth stating that these are the same thing.
4. On page 32, last paragraph, second sentence, a range labeled "OpZonesTOH" is described. Similar ranges are cited in the following pages. It is worth stating that these ranges are predefined in the spreadsheet and stating where the user can find them.

Expert Scientific Peer Review of the Upper Kissimmee – Operations Simulations (UK-OPS) Model

By

Richard Punnett, Ph.D.

To

South Florida Water Management District
3306 Gun Club Road
P.O. Box 24680
West Palm Beach, Florida 33416-4680

Date: November, 2019

EXECUTIVE SUMMARY

At the request of the South Florida Water Management District, a peer review of the Upper Kissimmee – Operations Simulation (UK-OPS) Model and the accompanying Draft Documentation Report was conducted. The purpose of the scientific peer review was to examine the theoretical underpinnings of the UK-OPS model and to assess the appropriateness for the model for the intended uses.

The UK-OPS model simulates operational strategies using a water budget approach. Water budget models have been successfully used across the nation for a variety of water management purposes. Regional water budget models have been successfully used in South Florida water management evaluations for decades. The UK-OPS model is a newer version of previous Excel-based water budget models. The model is both impressive and sophisticated. Numerous modeling options are included which allows a user to quickly evaluate numerous operational strategies.

The model was correctly designed and developed to evaluate water withdrawals based on optional criteria for the large lakes: East Lake Tohopekaliga, Lake Tohopekaliga, and Lake Kissimmee-Lake Cypress-Lake Hatchineha grouping. The Documentation Report clearly lays out the modeling features, processes, hydrologic and operational assumptions, basic capabilities and limitations. The extensive model building experience and expertise of the SFWMD modeling staff were clearly evident. Numerous helpful graphics and performance indicators are provided by the internal post-processing of the model's basic hydrologic output. The basic output and post-processed information makes it easy to ensure that movement of water is correctly accounted for and that model operations are consistent with the modeling intent.

Helpful examples of both a position analysis run and a continuous simulation were provided in the Documentation Report. In the position analysis example, the value to help with seasonal operation decisions was obvious. The use of the continuous model run, to determine the magnitude and timing of water withdrawals that would be consistent with the Kissimmee River Restoration Project criteria, was clearly demonstrated.

The principle findings of this report are that the UK-OPS model was appropriately developed and that the model can be used for the intended purposes.

TABLE OF CONTENTS

INTRODUCTION

As part of an ongoing effort to manage the water resources of central and south Florida, the South Florida Water Management District is developing an Excel-based model of the Upper Kissimmee Chain of Lakes. The model was designed to improve the flow regime of the Kissimmee River Restoration Project (KRRP) and to evaluate the operations in the Kissimmee River Basin in order to better meet restoration targets while providing for other objectives such as flood control, recreational uses and water supply. The model focus is on the operation of the three major lake systems: Kissimmee-Cypress-Hatchineha (KCH); Lake Tohopekaliga (TOH); and East Lake Tohopekaliga (ETO). The model was named the Upper Kissimmee – Operations Simulation (UK-OPS) Model. The model capability was expanded for the Kissimmee Basin Water Reservation (KBWR) Rule criteria to evaluate potential surface water supply withdrawals in order to demonstrate that there would not be an adverse impact to the water resources and associated ecology of the lake systems, as well as the KRRP.

The Excel-based model performs a daily timestep simulation of the hydrology and operations of the Upper Kissimmee Basin (UKB) using a 49-year period of record. The model can make a continuous 49-year simulation or a position analysis simulation using the same initial conditions for each of the 49 years. The run time of the model is about four minutes. The most recent version is UK-OPS (v3.12) and is the subject of the peer review along with the Final Draft Documentation Report for the Upper Kissimmee – Operations Simulation (UK-OPS) Model, dated September, 2019.

The UK-OPS model also considers the smaller lake systems, upstream of the large lakes, for the purposes of setting hydrologic boundary conditions and for evaluating the potential effect of the in-lake Water Reservation Lines (WRL). Lakes Hart and Mary Jane (HJM), and Lakes Myrtle, Preston and Joel (MPJ) are upstream of, and generally release water into, ETO. The Alligator Lake Chain (ALC) and Lake Gentry are upstream of, and release water into, the KCH. The smaller lake releases are modeled implicitly as part of the Watershed Net Inflow (WNI) to each of the larger lakes.

The peer review experts were asked to examine the theoretical underpinnings of the UK-OPS Model and to assess the appropriateness of the model for recent applications. The peer-review experts' reports were to identify model strengths, limitations, any flaws in the model conceptualization, and the appropriateness of applications. Based on the peer-review reports, any suggestions would be strongly considered for improvements prior to the release of the Final Documentation Report and the UK-OPS model. An excerpt from the Scope of Work (SOW) for the Peer Review is attached as Appendix A. This report is one of the two peer review reports.

PEER REVIEW COMMENTS

The peer review comments presented here are divided into five sections. Each of the five sections relates to the five specific peer review questions as detailed in the SOW. The peer review experts were provided both with the UK-OPS Model Excel workbook and the Final Draft Documentation Report which provided the technical aspects of the model. The reviewers were to analyze and evaluate the model as documented.

Responses to SFWMD specific questions

Section 1. *Is the water budget approach technically sound for its intended purpose, which is to enable simulation of alternative release strategies and potential water supply withdrawals?*

Response:

The SFWMD has been involved in the development and successful use of Excel-based water budget models for many years. The popularity of Excel-based water management models by other agencies (such as those presented on the USDA, USGS and other state-operated websites) is a testament to the wide-spread faith and successful use of that application.

Water budget modeling has been used in South Florida studies by both the SFWMD and the Corps. In 1993, the Corps' Reconnaissance Phase of the Everglades Restoration Plan relied on developing and using a water budget model. Using the water budget model, the Reconnaissance Planning Phase identified several potential alternatives in which the project benefits would outweigh project costs, and the study was then advanced to the Feasibility Phase which became known as the Comprehensive Everglades Restoration Program (CERP).

Following severe droughts across the U.S. in the 1980s, Congress authorized the U.S. Army Corps of Engineers to conduct a nationwide survey to find a better way to manage water during drought. As part of the National Study of Water Management During Drought (simplified to the "National Drought Study"), "shared vision (computer) models" were developed using the water budget modelling approach. The approach fostered a collaborative use of the models between stakeholders, agencies, users, advocates and experts. Seven steps were identified in the shared vision approach; the third step involved building a shared vision computer model which depicts the reservoir storage, inflow, release and the rules governing releases. The shared vision model allowed users to evaluate a larger number of variables and more complex relationships than would otherwise be possible. Because the model was often used in real time during public meetings, the model had to be fast, easy to understand, verifiable and provide the output necessary for stakeholders use. Thus, water budget models, usually on a daily time-step, have been developed and extensively used with great success. In

1988, eight river basins across the U.S. were identified. One of the studies was conducted for the 12,300 square mile Kanawha River basin which covered parts of three states (NC, VA and WV). The peer reviewer of this report developed and successfully used a water budget model for that study. Because the UK-OPS model was designed and developed to function in the same manner as the shared vision models for planning, the model would also be effective in a shared vision process for regulatory purposes. Because of the UK-OPS model's ease of use and ability to quickly screen different alternatives while quantifying the effects of water withdrawals, permitting thresholds can be quickly evaluated.

Section 2. ***Is the water budget approach applied correctly for the three large lake systems that use the hydrologic routing computations, namely Lakes KCH, Tohopekaliga, and East Tohopekaliga?***

Response:

At the heart of any hydrologic modeling approach is that the model must conserve mass. Beyond that, the models must correctly apply generally recognized equations, calculations of structure flow equations, identification of water sources and losses, and properly coded rule-based operations. Furthermore, there should be an identification of the inherent limitations of the models.

Apart from the correct application of equations, flow calculations, definitions of rule-based operations, etc., the modeling of those parameters must be accomplished within a numerical modeling environment – in this case the Excel Spreadsheet program. Because of the common usage of Excel, many users – apart from the developers – can evaluate the UK-OPS spreadsheet model. To aid in the spreadsheet evaluation of consistencies, dependencies and values for this report, a spreadsheet analyzer, Excel Analyzer, was used. Excel Analyzer was developed by Spreadsheetsoftware (http://www.spreadsheetsoftware.com). In part, the Excel Analyzer identifies and highlights potential errors, evaluates and highlights unique equations, checks variable names for consistency, checks links between worksheets, evaluates table entries, can eliminate extraneous cells (thus reducing the size of a workbook), checks for and can resolve may spreadsheet errors, analyzes embedded VBA coding, checks for errors in chart formulas and conditional format formulas, identifies hyperlinks, checks for name errors in inter-sheet links, checks for hidden data, provides formula statistics for each worksheet, generates a list of all comments, and generates a model flow sheet that visually displays dependencies between worksheets. Although Excel Analyzer is particularly helpful to spreadsheet developers, it was helpful for this evaluation. In short, no errors were found in the UK-OPS Excel spreadsheet model. Samples of the Excel Analyzer output products are provided in Appendix B.

For the three large lakes (ETO, TOH and KCH), the methodology described in the documentation is consistent with common modeling practices. The smaller, upstream lakes were used appropriately as boundary conditions for the larger lakes.

Thus, the inflows, plus rainfall, plus intervening watershed flows (both surface and groundwater), minus large-lake evapotranspiration (E.T.), and minus large lake outflows, constitutes the bulk of a large-lake water budget.

Some of the difficult terms to quantify are intervening watershed flows, groundwater contributions, past withdrawals, non-uniform rainfall, and surface water inflows from minor tributaries (not gauged or measured). For water budget models, a common practice is to use lumped, calculated values. The UK-OPS model uses the Watershed Net Inflow (WNI), together with lake rainfall (RF), for this purpose. For ETO, TOH, and KCH, the daily values of WNI+RF was calculated by accounting for the known (measured or calculated) lake outflows, inflows, changes in lake storage, and ET losses. The equation used in the UK-OPS model is a rearranged form of the continuity equation (a.k.a. the mass balance equation). In water budget models, the conservation of water in a system can be evaluated at every timestep or other intervals. The conservation of water in a modeled system over time is a strong indicator that the modeling of alternatives is reliable.

As with *any* numerical modeling, some sources of error are: calculation of flows through a structure; applying rainfall measured at point (or points) over a region; the unavailability of historic records; quantifying local groundwater and/or surface water withdrawals amounts over years; the application of ET losses (which can seasonally vary with watershed land-cover changes and local winds); soil moisture changes; estimates of lake storage and stage relationships; and the effect of wind across a lake surface that can cause water levels to be temporarily "tilted" resulting in a seiche (where the lake sloshes between opposing shores) that may last for days. The seiche effect of several feet has been measured on Lake Okeechobee. Additionally, river flow velocities change over time due to many factors including the magnitude of the flow.

To the unaccustomed model user, the daily WNI+RF values may be larger and more variable than expected. This is primarily because the distance between lakes vary and flow routing times vary. This is similar to comparing a check book balance to a bank balance on a daily basis. There are time variations between making a deposit or withdrawal and seeing the actual increase or decrease register at the bank. Similarly, a release from one lake may take longer or shorter than a day to reach the next gauged site. Ultimately, the timing issues do not change the actual accounting of the balance. The WNI+RF term corrects for the changes in timing (as well as the non-level lake issues) and when used with the simulated water balance, correctly conserves water. On an annual average basis, the WNI+RF values given in the UK-OPS workbook were fairly consistent and reasonable (as reviewed in the WatBuds tab).

The strength of the water budget approach is that when most inputs are held constant, the effect of operational strategies alone can be observed as changes in flow and stage in the modeled system. With the period of record values of WNI+RF held constant through each model run, the effect of alternative operations can be more readily observed. As long as there are not great changes in stages and flows over the run, the effect of operations can be reliably evaluated. As discussed later, a review of

the numerous output graphics and tables, with emphasis on the Water Budget analysis, also provides a degree of confidence in the spreadsheet application and modeling approach.

In the Documentation Report, the verification model run output was given which demonstrated that the simulated outflows replicated the stages of the historic outflows (used to calculate the WNI+RF values). Absolute consistency with the routing calculations with the historic stages shows that the model conserved mass. This agreement was seen in the graphics and tables provided.

As presented in the Documentation Report, water budget approach was correctly applied for ETO, TOH and KCH. The use of the WNI+RF term appropriately accounts for the hydrometeorological gains and losses of the many variables that were not explicitly modeled. The water budget approach has proven to be successful in many South Florida modeling efforts as well as in other hydrologic models across the nation.

Section 3. ***Does the draft technical documentation adequately describe the model's fundamental features, basic capabilities and limitations, and the algorithms used to simulate lake releases and water levels? Are there any specific suggestions to improve the description of the model?***

Response:

Since the UK-OPS model was specifically designed and developed to evaluate operational alternatives and the associated system changes, being able to define current and alternative lake operational criteria are critical. For each of the large lakes, the Documentation Report clearly presents the current regulation schedules along with a future KCH regulation schedule (RS9D) to be implemented upon completion of the Kissimmee Headwaters Revitalization Project. Operational zones for determining discharges were presented along with zones established for fish and wildlife protection. Users can modify the break points established for the various zones. The spreadsheet will calculate the values needed for a daily timestep from the break points.

The weir equation is used to calculate the outflow from ETO, TOH and KCH in the model runs. However, some limitations were set on the maximum allowed outflows. For ETO, the spillway capacity is 1300 cubic feet per second (cfs) even though the highest peak flow over the period of record was 2160 cfs. As noted in the Documentation Report, if an analysis of flood peaks is desired, then the model would need refinement. Also, ETO has a maximum allowable gate opening and a maximum permissible head difference across the structure that are not explicitly modeled in the spreadsheet. If a user desires to raise the spillway capacity to more than 1300 cfs, the user should contact the model developers for more guidance. Because the 1300 cfs limit is consistent with the 99th percentile value of the period of record flows (1965 to 2005), this is a reasonable limit for the kinds of operational alternatives envisioned in the Documentation Report. By viewing the graphic provided on the FlowpercsS59 tab of

the UK-OPS workbook, the rarity of the 1300 cfs limitation can be seen for alternatives.

Similar to the maximum flow capacity and rationale at ETO, TOH outflow capacities were limited to 2300 cfs (the 98th percentile value): the maximum flow over the period of record was 3750 cfs. Also, ETO has a maximum allowable gate opening and a maximum permissible head difference across the structure that are not modeled in the spreadsheet. If a user desires to enter a maximum outflow capacity greater than 2300 cfs, the user should contact the model developers for more guidance. The 99th percentile flow value was 2600 cfs; the 2300 cfs limitation is a reasonable limit for the kinds of operational alternatives envisioned in the Documentation Report. By viewing the graphic provided on the FlowpercsS61 tab of the UK-OPS workbook, the rarity of the 2300 cfs limitation can be seen for alternatives.

KCH outflow capacity is set at 11,000 cfs which is the spillway design capacity at S65. The model does not simulate stages downstream of S65, so normal weir calculations are not made and releases are determined using a stage rate-of-change relationship with outflow as described in the Documentation Report. In reviewing the historic data at S65, using the spillway design capacity is reasonable. Additionally, the model developers determined the Kissimmee River stages would not reduce full capacity of 11,000 cfs.

The historic flow and stage data are given in the DATAforUKOPS tab of the UK-OPS workbook. A user can review the data, make plots, and locate high flow periods to evaluate the maximum flow limits of historic data, if desired. The effect of slightly lowering the maximum releases may cause a slight increase in the duration of a rare and extreme event, but would not alter the mass balance. A slight increase in the event duration would not be a significant issue. During extreme high-flow periods, the likelihood of concerns over a water supply withdrawal would be minimal. Content descriptions of the other worksheets are provided in the Documentation Report. Additionally, the sources of data are provided.

If flow increases greater than normal gravity flows over a spillway are desired, the UK-OPS model includes an additional pumping capacity for the outflows of ETO and TOH. This pumping capacity could be used to augment spillway flows if they are not sufficient to achieve a desired outflow. Because the additional pumping may reduce the spillway flows by raising the tailwater conditions, a user-defined percentage reduction of the spillway flows is optional.

For each timestep, the amount of storage in each of the large lakes is calculated. From the amount of lake storage, a stage-storage relationship is used to calculate the resulting lake stage. This is a common and acceptable practice in the water budget modeling of lakes.

The documentation provides ample information to understand the basic capabilities, features, use of algorithms and model limitations. Additionally, there are over 2000 comments included in the UK-OPS workbook.

SUGGESTIONS:

A. A sample paper work sheet (i.e. a handout) could be developed to help users identify what specific changes (and which tabs) are required for an alternative. The paper work sheet would also help identify alternative changes that could be evaluated by a reviewer other than the user. The sheet could be attached as an Appendix to the Documentation Report.

B. Improve the description of the option to reduce spillway flow when using additional pumping. Perhaps a nomograph could be constructed that would help a user to quickly estimate a reduction percentage. If this option is not anticipated to be widely used, then a case-by-case evaluation may be sufficient. It is also recommended to add a figure to the UK-OPS model documentation report to clarify this hydraulic condition. The figure could show a profile view of headwater and tailwater stages, the gated spillway, and adjacent pumps.

C. The continuity equations for ETO and TOH should explicitly show the water supply withdrawal term.

D. Future versions of the model should consider the explicit simulation of the continuity equation and operations for the small lakes, HMJ, MPJ, GEN and ALC. This would allow for withdrawal investigations of the Eastern branch of the Kissimmee Chain-of-Lakes. Alternatively, a separate analysis could be conducted to determine the benefits (if any) of adding this explicit simulation of the small lakes.

Section 4. ***Is the model suitable for simulating alternative operating criteria for East Lake Tohopekaliga, Lake Tohopekaliga, and Lakes Kissimmee, Cypress, and Hatchineha?***

Response:

The UK-OPS model was constructed to be able to change the important variables associated with the purpose of running an alternative. The user-friendly construction of the UK-OPS is both rare and impressive. Typically, a user has to be familiar enough with the model construction to go to a certain area of a model and change certain variables. Clearly, the UK-OPS model was developed with the intention of building alternative operations and making the evaluations easy and rapid. The GUI on the first worksheet gives the new user an excellent starting point to build and compare alternatives. A new user can select a button from the GUI page to change the type of model run (position analysis or continuous), start a model run, identify up to four runs for comparisons, or go directly to a number of input and output graphics/tables. The Documentation Report discusses the contents of the various worksheets so users

will know where to go in the workbook to view/change variables. Regardless of the user experience, the UK-OPS model provides ample options for making alternative operation evaluations.

Some of the UK-OPS modeling options provided for creating alternatives should be used by experience users. These include: significant changes in the breakpoints of operational zones, significant changes in the discharge curves and increases to maximum outflow release criteria. An experienced user can chose to input a new set of outflow operating rules for an alternative (Outflow option 4 for ETO and TOH, for example). Those types of changes require a higher degree of output evaluation than normally required.

Options for creating alternatives that would be more commonly used for evaluating water supply withdrawals would be: making minor changes in the breakpoints of operational zones and/or water reservation lines, selecting different of outflow operations for the large lakes, selecting different pump sizes to augment gravity flows over a spillway, selecting different withdrawal rates, and selecting different lakes for making withdrawals.

Without sufficient output products and information, an alternative evaluation is difficult. The UK-OPS includes many hydrologic graphics, performance indicators, and tables to facilitate alternative evaluations. A description of the graphics, tables and performance indicators was provided in the Documentation Report. Users should always evaluate the stage and flow output of the model from the standpoint of ensuring the results are consistent with the modeling intent on a daily basis. The daily stage and flow data can be used to determine if any unusual changes occur. The stage (or flow) duration curve can be considered the equivalent of an executive summary of changes to determine if changes in stage or flow tend to occur during high or low events. Other performance indicators included in the model output can be used to evaluate the viability/suitability of a model run.

The UK-OPS model is currently used in a position analysis mode for real-time water management decisions. The example given in the Documentation Report shows the model can be used to simulate flows from ETO, TOH and KCH. Lake stages are presented in terms of stage percentiles for different events. The model will predict flows from S65A which are then routed through a Kissimmee River model for use as a major input source for Lake Okeechobee simulation models. The fact that the UK-OPS model is currently being used for position analyses is a testament to the modeling staff's faith in the model.

From the continuous run example in the Documentation Report, the model can be used for simulation of operational alternatives at TOH and KCH. Although not specifically shown, the spreadsheet construction and documentation leave little doubt that ETO operational alternatives can also be correctly simulated.

Regardless of the user experience, the UK-OPS model provides ample options for creating, simulating and evaluating alternative operations for ETO, TOH and KCH; users can also make position analysis runs if current condition data are known. Because UK-OPS was developed as an Excel workbook, users have the ability to create new performance measures or new statistics to help evaluate parameter sensitivities and to identify favorable alternatives. These abilities make the UK-OPS model particularly suitable for evaluating operations for the three large lakes.

Section 5. *Is the model suitable for evaluating: (1) individual and cumulative water supply withdrawals, (2) the associated Kissimmee Basin Water Reservation criteria limitations on those withdrawals, and (3) the effects of water supply withdrawals on the 5% maximum reduction criteria at S65?*

Response:

The options available for creating and simulating different operational alternatives are sufficient for the intended use of the UK-OPS model which is to quickly test alternative operating strategies. The evaluation of alternatives is relatively easy and the prediction of changes in flow at S65 were shown to be sensitive to water supply withdrawals from TOH.

Withdrawals from the smaller upstream lakes would ultimately reduce the flow into ETO, TOH and KCH. Therefore, the cumulative effect of making water supply releases from ETO, TOH and the small lakes can be quantified at S65. Since the smaller lakes are not explicitly modeled for the purpose of making water supply withdrawals, the spatial distribution of water supply withdrawals from HMJ, MPJ, ALC and GEN cannot be determined with UK-OPS. Instead, the UK-OPS Model determines the timing of the allowable withdrawals from the small lakes, but approximates the withdrawal by making it from the next downstream large lake. In the UK-OPS model, it is assumed water supply withdrawals are made directly from the large lake, or its tributary inflow, and would not be achieved by using the upstream water control structure.

The large lakes in the UK-OPS model represent 86% of the total storage in all the managed lakes upstream of S65. The simulation of the water supply withdrawals from the three large lakes ETO, TOH and KCH is sufficient to determine the potential cumulative flow reductions at S65 over the period of record used.

MODEL SUITABILITY

The determination of model suitability is not only an evaluation of the equations, construction and available options for creating alternatives, but also whether or not the use is appropriate. To fully appreciate the water budget approach (UK-OPS) when a more detailed model is available (Mike11/MikeSHE), the following points were considered:

1. What are the some of the specific question that need to be answered? Two questions were considered:

   First, using the KBWR Rule criteria, what is the maximum withdrawal capacity needed that would achieve water supply deliveries so that there is no more than a 5% reduction at S65? Essentially, this is a water budget evaluation since the flow reduction criterion is set at a specific point. Although there are system wide constraints (WRLs), system wide impacts need not be considered unless significant large withdrawals are made. The continuous run example given in the Documentation Report identifies a hypothetical max withdrawal rate of 64mgd, or less, from Lake TOH. Since the WRL constraints were al included and TOH met the withdrawal demand, system wide impacts are not likely.

   Second, what use does the position analysis provide? Position analysis allows evaluation of shorter-term operating plans, which are to be implemented seasonally (about 6-months). Rapid assessment of alternative operations is needed to help the interagency scientists test and evaluate many ideas. This could only be done with UK-OPS because more-detailed models like the Mike SHE/Mike 11 model takes more than 10 days to perform a 50-year simulation. A run time of four minutes is valuable whereas a run time of 10 days would not be useful.

2. Is there a specific target or are wide-spread impacts being evaluated?

   If wide spread system targets and impacts require evaluation, this could only be done by the Mike11/MikeSHE model. Since the specific target given by the KBWR Rule criterion is a flow reduction set at a point, S65, UK-OPS can simulate flow changes at that point. Specific evaluation of impacts to wetlands, groundwater resources, flooding, etc., cannot be performed with the UK-OPS Model.

3. Is the alternative modeling of ETO, TOH and KCH sensitive to operational alternatives?

   Sensitivity to upstream operational changes would be expected in either model. The continuous run example in the Documentation Report demonstrates the usefulness of UK-OPS. If the *best* estimate of flow at S65 was required, there would be debate. However, because the question involves a flow difference due to operational changes and/or water supply withdrawals, the UK-OPS model certainly would be sufficient.

4. Is there a direct modeling solution or are iterations required?

   In the continuous run example in the Documentation Report, it was stated that an iterative solution was used. if a specific operational target is required, a "one run and done" is unlikely with any model.

While iterations are possible with time and multiple computers using Mike11/MikeSHE, the four-minute run time of UK-OPS is favorable for a quick and easy resolution.

5. Is an understanding of the sensitivity to operational parameters desired?
   When the effect of changing any modeling parameter is unknown, there must be some sensitivity runs. These runs will not only help in planning iteration runs toward meeting a target, but also highlights which parameters are more sensitive than others. If a parameter is particularly sensitive, additional evaluation of the parameter may be needed. Again, the need for multiple runs favors the use of UK-OPS.

6. Are multiple base assumptions to be considered?
   In the case of a system where three lakes (or more) can be considered for operation changes, base assumptions change. A hypothetical example would be: which lake, or combination of lakes, should have a modified operation that best meets the target flow? Where there are multiple lakes that can be operated differently, there can be multiple iteration runs for each lake or lakes combination. This complexity can be easily handled by UK-OPS.

7. Who are the potential users?
   Within the SFWMD, there are requirements for both models. The specific need would be a determining factor. However, if the model is to be used outside the SFWMD, only the Excel-based UK-OPS model would have universal applicability whereas few stakeholders have the ability to make and evaluate Mike11/MikeSHE model runs.

8. What operational lessons can be learned from the information given on the continuous run example in the Documentation Report?
   In the continuous run example in the Documentation Report, several germane points can be made: (a) the UK-OPS model can be used to determine the total capacity of the combined water supply withdrawal facilities (64mgd) from Lake TOH, assuming no withdrawals from the other lakes; (b) the S65 maximum flow reduction target is sensitive to water supply withdrawal alternatives with the UK-OPS model; (c) the Lake Okeechobee non-flood release criterion (aka Lake O constraint) can be severely restrictive compared to the KBWR Rule criteria flow reduction target; (d) withdrawals from TOH alone could meet or exceed the KBWR Rule criterion of not more than a 5% maximum reduction at S65, (e) water supply reliability is highest during the March to June timeframe which is associated with the drawdown prior to the wet season, (f) the average annual withdrawal was 39 kaf/yr (or 19 kaf/yr with the Lake Okeechobee restriction), and (g) water supply withdrawals become much less reliable with the Lake Okeechobee restriction in all but the very wet periods.

LIMITATION

When modeling extreme changes system parameters, a water budget approach would not be as appropriate as a more detailed modeling. For example, if significant increases or decreases in downstream river stages or flows occur, then other hydrologic effects, not modeled in a water budget model, might become significant. A user should always evaluate the daily stage and flow data output for unusual or extreme changes.

OVERALL FINDINGS AND RECOMMENDATIONS

The model development expertise of the SFWMD modeling staff is apparent in the design and construction of the UK-OPS Excel-based model. The model was developed to specifically address evaluations associated with the operation of the large lakes in the Upper Kissimmee Basin and the Kissimmee River Water Reservation Rule criteria. The evaluation of the KBWR Rule criteria primarily involves predicting flow reductions at S65 which ultimately is a water budget question. This kind of modeling analyses may also involve an iterative process which also favors a water budget approach. The UK-OPS model can be used in a position analysis mode which enables the rapid design and evaluation of seasonal operating plans.

The author of this report whole-heartedly agrees with this statement from the Documentation Report, Summaries and Conclusions: "Strengths of the UK-OPS Model include the ability to rapidly test alternative operating ideas (runtime of 4 minutes versus days or even weeks for the more-detailed models), ease of use in a readily-available environment (Excel), broad range of options for specifying alternative operations, immediate updating of the outputs and performance metrics, and flexibility to modify the Excel worksheets and chart sheets to add additional features and/or performance summary graphics."

The Documentation Report provides the detail necessary to understand the equations, rules and processes involved in the model. Standard water budget modeling procedures and practices were employed. By reviewing the Documentation Report and the UK-OPS model together, a potential user can get a clear understanding of the modeling input, processes and outputs. The UK-OPS model internally generates a series of hydrologic outputs and performance indicators. With little training, new users of the model can make meaningful operational alternatives within the Kissimmee River Basin by simulating and evaluating the operations of the three largest lakes.

It is recommended that a separate Excel-base model be developed for the purpose of testing *or characterizing* the effect of water supply withdrawals on lakes HMJ, MPJ, ALC and GEN. The new workbook could link to the output from UK-OPS to retrieve data specific to a modeled alternative. Such an effort would help to determine the sensitivity of water supply withdrawals from the small lakes on the 5% KBWR Rule criterion and the validity of the current assumption that makes the small lake water supply withdrawals from the next-downstream large lake

It is also recommended that a one-day workshop be scheduled for potential UK-OPS users. The workshop could supply the knowledge and skills necessary to understand and start using the UK-OPS model. If a recording of the workshop was made, future users could reference the on-line recording and benefit from the same workshop. Further, development of an accompanying handout which provides the blank spaces for selection of a modeling options and spreadsheet location of pertinent variables would be immediately helpful.

The key finding and recommendation from this report is that the UK-OPS model can be used for the intended purposes. The model does not require any significant changes. While improvements are possible, the current status is usable by model developers and other interested users.

APPENDIX A

Excerpts from the Peer Review Statement of Work

H&H Bureau
Statement of Work (SOW)
for Expert Scientific Peer Review of the
Upper Kissimmee - Operations Simulation (UK-OPS) Model

Project Manager:	Danielle Morancy
Project Technical Lead:	Calvin Neidrauer
Project Name:	Independent Scientific Peer Review of the Upper Kissimmee - Operations Simulation (UK-OPS) Model
Date:	September 30, 2019

Statement of Work Summary

This Statement of Work (SOW) defines services to perform a scientific peer review of the Upper Kissimmee - Operations Simulation (UK-OPS) Model.

The UK-OPS Model has been created and is maintained by the South Florida Water Management District (SFWMD or District) in West Palm Beach, Florida. This model is a computational tool that can be used to evaluate various water management operations and surface water withdrawal scenarios for both continuous (period-of-record) simulations and position analysis. As part of the development life cycle of this model, two experts in hydrologic modeling will be chosen to examine and evaluate the model's conceptual formulation, and review how the model has been applied to address project objectives for various projects in south Florida. The purpose of this work is to improve the overall quality of the UK-OPS Model by identifying the strengths, weaknesses, and limitations in the model theory, conceptual formulation, and typical applications.

The experts' scope of work shall consist of the tasks specified in section 3. These tasks include:

1. Reading supporting UK-OPS Model documentation and preparing initial comments.
2. Participating in a one-day teleconference in October 2019. The teleconference is to demonstrate the model utility and provide opportunity for Q&A with model developer and reviewers.
3. Preparing a report on the model's suitability.

1.0 Introduction

In 2014-15 the SFWMD completed initial development of the Upper Kissimmee - Operations Simulation (UK-OPS) Model. The model was initially developed to enable rapid testing of alternative operations for the following lakes in the Upper Kissimmee Basin (UKB) (Figure 1): (1) East Lake Tohopekaliga (East Lake); (2) Lake Tohopekaliga (Lake Toho); and (3) Lakes Kissimmee, Cypress, and Hatchineha (Lake KCH). The model was initially used to evaluate alternative operations for seasonal planning of these lakes and inflows to the Kissimmee River.

In 2016 the UK-OPS Model was modified to include proposed water reservation lines associated with the development of the Kissimmee Basin Water Reservation Rule and to enable testing of potential water withdrawal scenarios. The aim was to enable the UK-OPS Model to be used as a regulatory tool by future permittees, consultants, and District permit reviewers for evaluating the potential impacts of accumulative surface water withdrawals on proposed Kissimmee River and Chain of Lakes water reservation criteria. The model will help prevent over-allocation of withdrawals to ensure the protection of fish and wildlife located in the Upper Chain of Lakes, Headwater Revitalization Lakes and the Kissimmee River Restoration project.

Throughout the period 2014-2019 the UK-OPS Model was refined to increase its utility. The current version and associated documentation is for UK-OPS(v3.12). The peer review will evaluate the conceptual framework of the model and assess its suitability for specific applications.

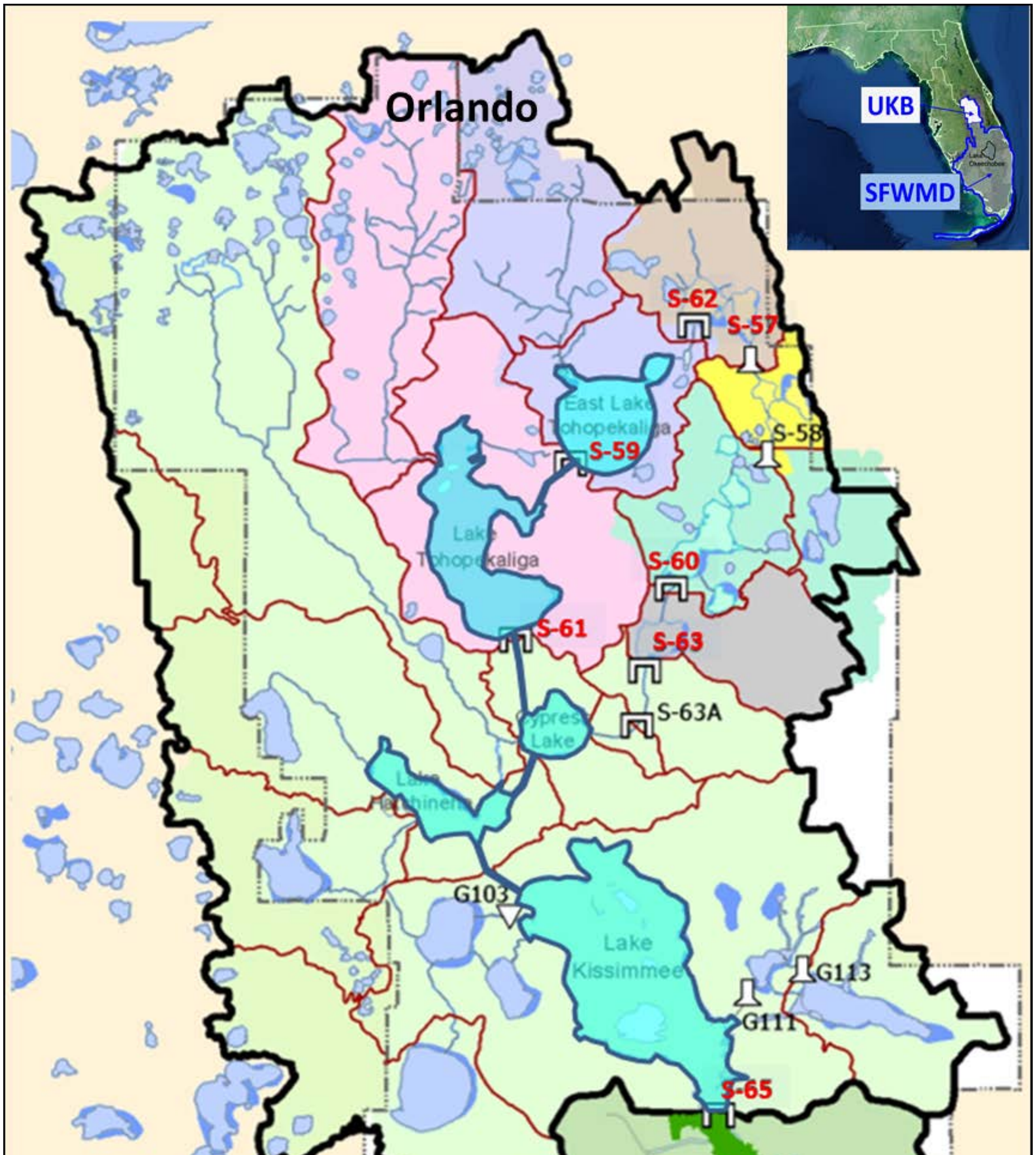


Figure 1. Map of the Upper Kissimmee Basin highlighting the Larger Lake Systems: East Lake Toho (ETO), Lake Toho (TOH), and Lakes Kissimmee, Cypress, and Hatchineha (KCH).

1.1 UK-OPS Model Scope

The UK-OPS Model is a spreadsheet-based hydrologic simulation model of the larger lake systems in the Upper Kissimmee Basin (Figure 1). The model can be used to test alternative operating criteria for seasonal operations planning. The UK-OPS Model can also be used to simulate the effects of surface water withdrawals subject to criteria proposed by the Kissimmee Basin Water Reservation Rule. Model users include experienced analysts, scientists/modelers involved with seasonal operations planning, consultants involved with analysis of proposed surface water withdrawals from UKB lakes, and SFWMD regulatory staff who evaluate such proposed withdrawals and issue water-use permits.

Considering the application of the UK-OPS Model for assisting with the development of the Kissimmee River and Chain of Lakes water reservation rule criteria and future water-use permit applications, it is prudent to have the model peer reviewed to establish its credibility and to reduce the chances of technical challenges and associated delays in rule development.

1.2 UK-OPS Model Features

The UK-OPS Model is a lumped-parameter hydrologic and planning-scale model of the larger lakes in the Upper Kissimmee Basin. The model does not simulate the rainfall-runoff process. Rather it uses watershed inflows from the historical record or from a distributed parameter model like Mike11/MikeSHE. The UK-OPS Model uses a daily timestep and currently simulates lake stages and releases for the 48-yr period 1965-2012.

The model can operate in continuous simulation mode for typical planning analysis, or in position analysis mode for shorter-term operations planning purposes. The continuous simulation mode produces one simulation for the period of record (one 48-yr simulation). The position analysis mode sets initial lake stage conditions and produces one simulation for each year of the period of record (48 1-yr simulations). The model automatically generates a wide variety of hydrologic performance metrics (hydrographs, duration curves, and assorted statistical summaries) to facilitate rapid analysis and comparisons of alternative plans. Details are contained within the Final Draft Documentation Report for the Upper Kissimmee - Operations Simulation (UK-OPS) Model (September, 2019).

To verify the appropriateness of the model, it requires peer-review by subject matter experts. The peer reviewers will try to identify the strengths, weaknesses, and necessary enhancements in the model conceptualization/formulation and in the software implementation.

2.0 Peer Review Expectations and Guidelines

The overall objective of this work is to perform a peer review on the conceptualization, implementation, and application of the UK-OPS Model to improve its overall quality and acceptability. This will be accomplished by review of the model by subject matter and scientific experts who will consider the conceptual and mathematical framework of the model and the appropriateness of the model for specific applications. It is expected that review will be accomplished by two experts, each providing their own report and independently contracted with

the SFWMD.

A final draft model documentation report will be provided to each peer review expert for review. The UK-OPS Model Excel file will also be provided. If the peer-review panel's report identifies meaningful flaws in the model, the model will be revised, and the final documentation report will be modified as necessary.

As shown in Table 1, the experts will be expected to attend a one-day workshop/teleconference in October 2019. This session will help the experts gain a better understanding of the UK-OPS Model, its capabilities, and its past applications.

Table 1: Peer Review Project Schedule and Responsibilities

Task	Date Range
Examine or Study UK-OPS Model Documentation and submit preliminary comments and questions.	From date of execution until the workshop September 30, 2019 – October 14, 2019
Participate in a 1-day workshop/teleconference	October 21, 2019
Submit final report	3 weeks after workshop

During the workshop/teleconference, a presentation & model demonstration will be made to familiarize the experts with the model. The presentation will be conducted by the UK-OPS Model developer so that the experts can interview the staff most familiar with the tool.

This SOW will serve as the task instructions for the experts until the workshop/teleconference. Any questions need to be submitted in writing to the SFWMD to allow communications to be conducted in accordance with Florida's public records statutes. The public can be informed by reviewing information and links to be provided on the SFWMD web-site. Public comments will be accepted during the three-week period after the workshop/teleconference.

2.1 Peer Reviewer Areas of Expertise

Qualifications of desired peer review experts include:

1. A recognized expert on hydrologic model development and model applications to multiple lake/reservoir systems.
2. Familiarity with central Florida hydrology and experience with modeling and/or operation of the Upper Kissimmee Basin.

2.2 Peer Review Goals

The peer review experts are asked to examine the theoretical underpinnings of the UK-OPS Model and to assess the appropriateness of the model for recent applications. The final draft model documentation report will contain this information and will be the primary focus of the peer review. The peer-review expert's reports will identify model strengths, limitations, any flaws in the model conceptualization, and the appropriateness of applications. Recommendations from the

peer-review expert's reports will be strongly considered for incorporation in the final model documentation report. Any meaningful flaws in the model will be corrected prior to future use.

The peer review experts will be provided both the UK-OPS Model Excel workbook and the final draft report documenting the technical aspects of the model. The reviewers should analyze and evaluate the model as documented. The specific questions that the reviewers need to answer are listed below:

1. Is the water budget approach technically sound for its intended purpose, which is to enable simulation of alternative release strategies and potential water supply withdrawals?
2. Is the water budget approach applied correctly for the three large lake systems that use the hydrologic routing computations, namely Lakes KCH, Tohopekaliga, and East Tohopekaliga?
3. Does the draft technical documentation adequately describe the model's fundamental features, basic capabilities and limitations, and the algorithms used to simulate lake releases and water levels? Are there any specific suggestions to improve the description of the model?
4. Is the model suitable for simulating alternative operating criteria for East Lake Tohopekaliga, Lake Tohopekaliga, and Lakes Kissimmee, Cypress, and Hatchineha?
5. Is the model suitable for evaluating: (1) individual and cumulative water supply withdrawals, (2) the associated Kissimmee Basin Water Reservation criteria limitations on those withdrawals, and (3) the effects of water supply withdrawals on the 5% maximum reduction criteria at S65?

2.2 Anticipated Benefits

The recommendations from the peer review reports will guide the SFWMD to make any necessary modifications to the UK-OPS Model and associated documentation report. The peer review will help the SFWMD to achieve a higher quality model that is scientifically defensible and more reliable.

3.0 Scope of Work (Duties and Tasks of Experts)

During this project, the peer review experts will be asked to conduct the following work:

1. **Examine or Study the Final Draft UK-OPS Model Documentation Report sent to you by the Peer Review Project Manager.**

2. **Prepare questions or editorial comments on all information prior to the workshop.** Experts should come to the workshop/teleconference prepared to discuss strengths and weaknesses of the model conceptualization and its applications. Written submittal of questions and comments at least one week prior to the workshop/teleconference will help SFWMD staff to prepare and better address the reviewers questions and comments.

3. **Participate in a one-day workshop/teleconference during October 2019.** Peer review experts will participate in the workshop/teleconference to learn more about the model and

to ask questions about it. It is expected that experts will have reviewed the draft model documentation report prior to the workshop/teleconference.

4. **Write an Expert Report.** Experts will each prepare a report which addresses the goals of this peer review. A draft report shall be submitted two weeks following the workshop. Panelists will consider SFWMD comments on the draft deliverable and submit a final report three weeks following the workshop.

APPENDIX B

Samples from the Excel Analyzer Output

for the

UK-OPS Model V3.12

Developed by Spreadsheetsoftware

The following snapshots were made (as a sampling) from the output products of the Excel Analyzer by Spreadsheetsoftware (https://www.spreadsheetsoftware.com). A new evaluation tab is generated by the Excel Analyzer for each tab in the model. Colored variable names often indicate linkages to the spreadsheet location(s). Not all Excel Analyzer products are presented in this appendix.

1 Formulas

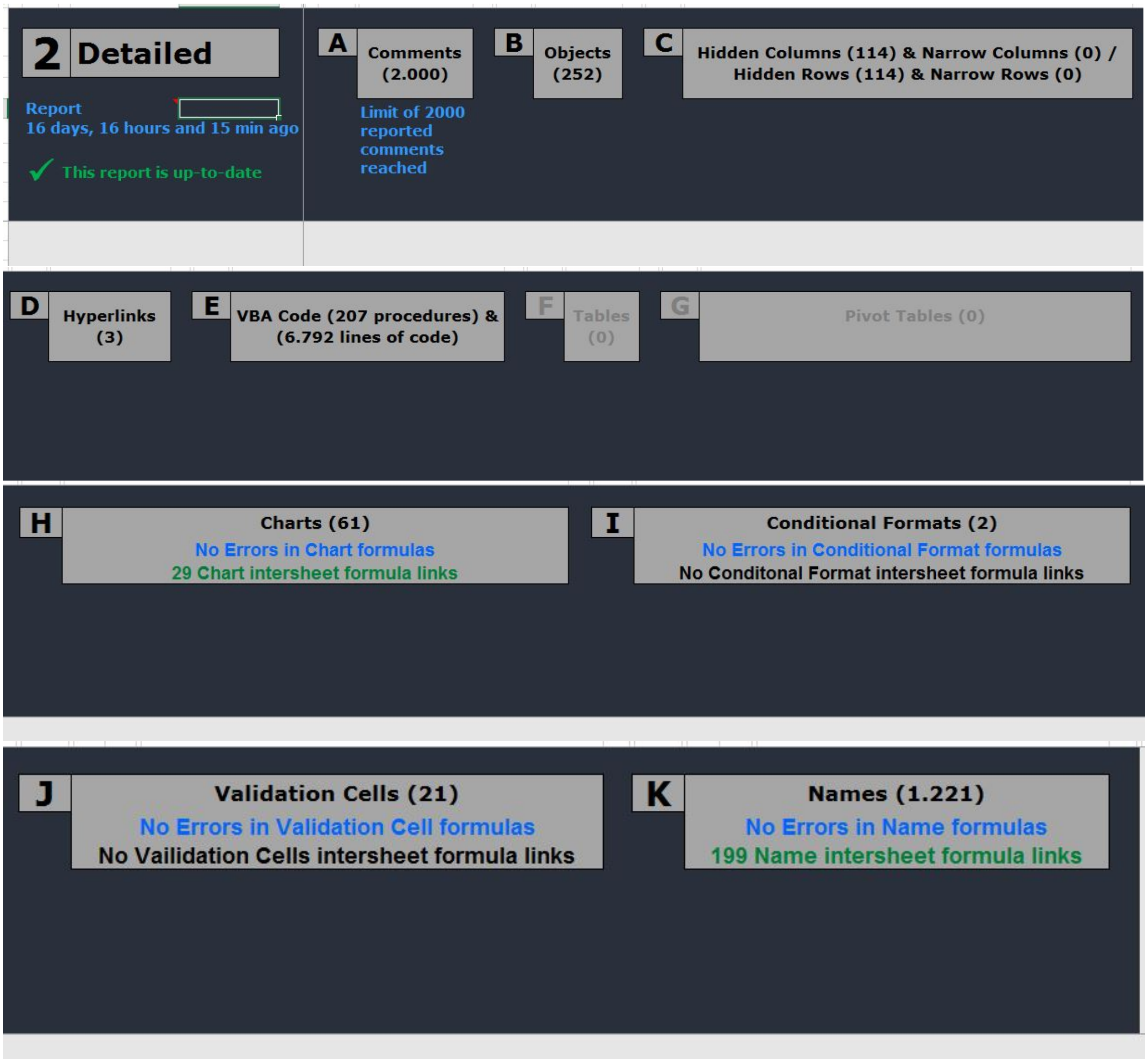
Report generated:
16 days, 4 hours and 28 min ago

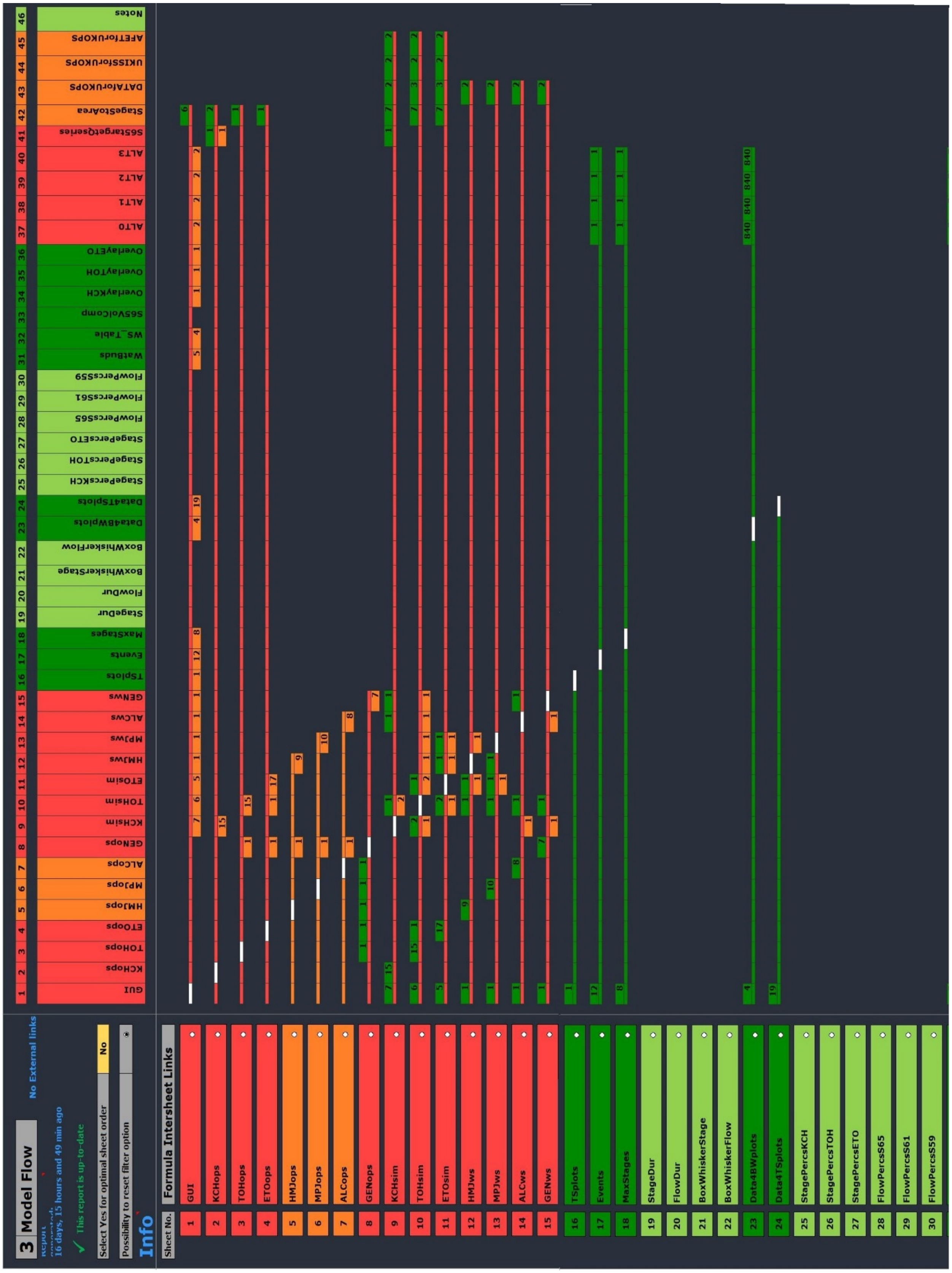
✓ This report is up-to-date

Info — 11 Formula Filter Options

0	#REF! Error	3,729	Absolute Formula
382	Hardcoded Formulas	0	Array Formula
0	External Links	0	Table Formula
3,646	Formula Intersheet Links	0	User Defined Function
575	Formula with Function	317	Formulas with Name
114	Formula with "Text"		

Sheet No.	Sheet Name (link)	Unique Formulas Total	Unique Formulas Once on Sheet	Unique Formulas	Formulas (link)	Formulas with Name
		4,201	3,680		423,492	317
1	GUI	12	12		12	12
2	KCHops	27	3		10,350	14
3	TOHops	14	4		3,689	6
4	ETOops	15	3		3,692	6
5	HMJops	7	1		2,938	3
6	MPJops	7	1		2,938	3
7	ALCops	8	1		2,948	3
8	GENops	9	3		2,941	4
9	KCHsim	115	34		873	30
10	TOHsim	97	27		36,517	30
11	ETOsim	102	28		18,664	30
12	HMJws	23	10		18,039	10
13	MPJws	25	11		18,047	11
14	ALCws	22	9		18,031	9
15	GENws	20	8		18,023	8
16	TSplots	5	4		52	
17	Events	58	36		4,101	27
18	MaxStages	29	14		266	8
23	Data4BWplots	3,383	3,366		4,766	12
24	Data4TSplots	43	27		143,247	41
25	StagePercsKCH	2	2		2	1
26	StagePercsTOH	0	0	This sheet contains no formulas	0	
27	StagePercsETO	0	0	This sheet contains no formulas	0	
28	FlowPercsS65	0	0	This sheet contains no formulas	0	
29	FlowPercsS61	0	0	This sheet contains no formulas	0	
30	FlowPercsS59	0	0	This sheet contains no formulas	0	
31	WatBuds	16	9		2,256	5
32	WS_Table	27	9		999	5
33	S65VolComp	32	12		361	4
34	OverlayKCH	7	1		32	
35	OverlayTOH	7	1		29	
36	OverlayETO	7	1		29	


2 Detailed
Report
16 days, 16 hours and 15 min ago
This report is up-to-date
A Comments (2.000)
Limit of 2000 reported comments reached
B Objects (252)
C Hidden Columns (114) & Narrow Columns (0) / Hidden Rows (114) & Narrow Rows (0)
D Hyperlinks (3)
E VBA Code (207 procedures) & (6.792 lines of code)
F Tables (0)
G Pivot Tables (0)
H Charts (61)
No Errors in Chart formulas
29 Chart intersheet formula links
I Conditional Formats (2)
No Errors in Conditional Format formulas
No Conditonal Format intersheet formula links
J Validation Cells (21)
No Errors in Validation Cell formulas
No Vailidation Cells intersheet formula links
K Names (1.221)
No Errors in Name formulas
199 Name intersheet formula links



3 Model Flow
16 days, 15 hours and 49 min ago
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No External links
Select Yes for optimal sheet order
No
Possibility to reset filter option
Info
Sheet No.
Formula Intersheet Links
GUI
KCHops
TOHops
ETOops
HMJops
MPJops
ALCops
GENops
KCHsim
TOHsim
ETOsim
HMJws
MPJws
ALCws
GENws
TSplots
Events
MaxStages
StageDur
FlowDur
BoxWhiskerStage
BoxWhiskerFlow
Data4BWplots
Data4TSplots
StagePercsKCH
StagePercsTOH
StagePercsETO
FlowPercsS65
FlowPercsS61
FlowPercsS59
WatBuds
WS_Table
S65VolComp
OverlayKCH
OverlayTOH
OverlayETO
ALT0
ALT1
ALT2
ALT3
S65TargetQSeries
StagetoArea
DATAforUKOPS
UKISSforUKOPS
AFETforUKOPS
Notes

4 General

Report generated:
16 days, 15 hours and 49 min ago

✓ This report is up-to-date

A General Sheet Information

Sheet No.	Sheet Name (link)	Sheet type	Sheet visibility	Sheet protection	Sheet is empty	Sheet calculation
1	GUI	Worksheet	Visible	No	No	On
2	KCHops	Worksheet	Visible	No	No	On
3	TOHops	Worksheet	Visible	No	No	On
4	ETOops	Worksheet	Visible	No	No	On
5	HMJops	Worksheet	Visible	No	No	On
6	MPJops	Worksheet	Visible	No	No	On
7	ALCops	Worksheet	Visible	No	No	On
8	GENops	Worksheet	Visible	No	No	On
9	KCHsim	Worksheet	Visible	No	No	On
10	TOHsim	Worksheet	Visible	No	No	On
11	ETOsim	Worksheet	Visible	No	No	On
12	HMJws	Worksheet	Visible	No	No	On
13	MPJws	Worksheet	Visible	No	No	On
14	ALCws	Worksheet	Visible	No	No	On
15	GENws	Worksheet	Visible	No	No	On
16	TSplots	Worksheet	Visible	No	No	On
17	Events	Worksheet	Visible	No	No	On
18	MaxStages	Worksheet	Visible	No	No	On
19	StageDur	Chart	Visible	No		
20	FlowDur	Chart	Visible	No		
21	BoxWhiskerStage	Chart	Visible	No		
22	BoxWhiskerFlow	Chart	Visible	No		
23	Data4BWplots	Worksheet	Visible	No	No	On
24	Data4TSplots	Worksheet	Visible	No	No	On
25	StagePercsKCH	Worksheet	Visible	No	No	On
26	StagePercsTOH	Worksheet	Visible	No	No	On
27	StagePercsETO	Worksheet	Visible	No	No	On
28	FlowPercsS65	Worksheet	Visible	No	No	On
29	FlowPercsS61	Worksheet	Visible	No	No	On
30	FlowPercsS59	Worksheet	Visible	No	No	On
31	WatBuds	Worksheet	Visible	No	No	On
32	WS_Table	Worksheet	Visible	No	No	On
33	S65VolComp	Worksheet	Visible	No	No	On
34	OverlayKCH	Worksheet	Visible	No	No	On
35	OverlayTOH	Worksheet	Visible	No	No	On
36	OverlayETO	Worksheet	Visible	No	No	On
37	ALT0	Worksheet	Visible	No	No	On
38	ALT1	Worksheet	Visible	No	No	On
39	ALT2	Worksheet	Visible	No	No	On
40	ALT3	Worksheet	Visible	No	No	On
41	S65targetQseries	Worksheet	Visible	No	No	On
42	StageStoArea	Worksheet	Visible	No	No	On
43	DATAforUKOPS	Worksheet	Visible	No	No	On
44	UKISSforUKOPS	Worksheet	Visible	No	No	On
45	AFETforUKOPS	Worksheet	Visible	No	No	On
46	Notes	Worksheet	Visible	No	No	On

4	General	B	Formula Statistics				
Report generated: 16 days, 15 hours and 49 min ago			Unique formulas		Total formulas	Total Constant cells	Total Text cells
Sheet No.	Sheet Name (link)		Total	Once on sheet			
✓	This report is up-to-date		4,201	3,680	423,492	9,196,437	991,878
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3	TOHops		14	4	3,689	1,738	190
4	ETOops		15	3	3,692	1,719	193
5	HMJops		7	1	2,938	707	56
6	MPJops		7	1	2,938	691	58
7	ALCops		8	1	2,948	715	54
8	GENops		9	3	2,941	721	52
9	KCHsim		115	34	873	1,069,920	18,188
10	TOHsim		97	27	36,517	815,650	89,684
11	ETOsim		102	28	18,664	869,308	107,580
12	HMJws		23	10	18,039	251,172	107,390
13	MPJws		25	11	18,047	251,172	125,282
14	ALCws		22	9	18,031	251,172	89,500
15	GENws		20	8	18,023	251,172	71,609
16	TSplots		5	4	52	98	58
17	Events		58	36	4,101	713,842	133
18	MaxStages		29	14	266	161,325	38
19	StageDur						
20	FlowDur						
21	BoxWhiskerStage						
22	BoxWhiskerFlow						
23	Data4BWplots		3,383	3,366	4,766	106	352
24	Data4TSplots		43	27	143,247	930,683	71,696
25	StagePercsKCH		2	2	2	16	38
26	StagePercsTOH		0	0	0	0	24
27	StagePercsETO		0	0	0	0	24
28	FlowPercsS65		0	0	0	0	0
29	FlowPercsS61		0	0	0	0	0
30	FlowPercsS59		0	0	0	0	0
31	WatBuds		16	9	2,256	5	50
32	WS_Table		27	9	999	53	56
33	S65VolComp		32	12	361	116	18
34	OverlayKCH		7	1	32	43	63
35	OverlayTOH		7	1	29	40	61
36	OverlayETO		7	1	29	40	61
37	ALT0		5	1	40	737,496	72,613
38	ALT1		5	1	40	737,496	72,609
39	ALT2		7	1	48	737,475	72,629
40	ALT3		9	3	501	737,516	72,590
41	S65targetQseries		19	4	108,593	55,557	29
42	StageStoArea		27	23	418	535	50
43	DATAforUKOPS		4	4	4	257,883	18,331
44	UKISSforUKOPS		3	3	3	178,973	26
45	AFETforUKOPS		3	3	3	178,973	27
46	Notes		0	0	0	1	155

4 General

Report generated:
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✓ This report is up-to-date

C Minimum & Maximum Value on sheet

Sheet No.	Sheet Name (link)	Minimum: Address (link)	Minimum: Value	Maximum: Value	Maximum: Address (link)
1	GUI	AP2; AP3; AG7; AD8; P10;	1	329,327.55	AP4
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3	TOHops	A20; A21	-41639	145,327.31	J59; J60; J61; J62; J63; J64
4	ETOops	A20; A21	-41639	125,794.22	J59; J60; J61; J62; J63; J64
5	HMJops	G25	0	42005	Probably a date value
6	MPJops	G25	0	42005	Probably a date value
7	ALCops	G25	0	42005	Probably a date value
8	GENops	G25; K29; L29	0	42005	Probably a date value
9	KCHsim	AZ6073	-41,118.83	540,083.59	I17096
10	TOHsim	AQ1547	-7,920.37	201,804.28	AR14531; P14532
11	ETOsim	J3145	-6,870.83	145,475.86	I17929
12	HMJws	R8; X10; S11; X11; AA11;	0	41639	Probably a date value
13	MPJws	S8; X10; T11; X11; AA11;	0	41639	Probably a date value
14	ALCws	Q8; X10; R11; X11; AA11;	0	41639	Probably a date value
15	GENws	P8; X10; Q11; X11; AA11;	0	41639	Probably a date value
16	TSplots	BW24; AB26; AD26; AB27;	1	29952	Probably a date value
17	Events	N14555	-509.18	42094	Probably a date value
18	MaxStages	V33; V58	-0.31	41639	Probably a date value
19	StageDur				
20	FlowDur				
21	BoxWhiskerStage				
22	BoxWhiskerFlow				
23	Data4BWplots	P3; Q3; R3; S3; T3; B7; BW	0	12000	P2; S2; T2
24	Data4TSplots	AH12; AH13; AH14; AH15;	0	41639	Probably a date value
25	StagePercsKCH	X26; Y26; X27; Y27; X28; Y	9	24351	Probably a date value
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27	StagePercsETO		Sheet contains no values	Sheet contains no values	
28	FlowPercsS65		Sheet contains no values	Sheet contains no values	
29	FlowPercsS61		Sheet contains no values	Sheet contains no values	
30	FlowPercsS59		Sheet contains no values	Sheet contains no values	
31	WatBuds	K50	-2,263.70	23988	Probably a date value
32	WS_Table	B5; C5; D5; E5; F5; G5; H5;	0	2013	A53
33	S65VolComp	K67; K93	0.03	23988	Probably a date value
34	OverlayKCH	AD2; Z4; AC7; AF7; Z12; A	1	1170	AC7; AF7; AC27; AF27
35	OverlayTOH	AD2; Z4; AC5; AD5; AE5; Z	1	1170	AF27
36	OverlayETO	AD2; Z4; AC5; AD5; AE5; Z	1	1170	AF27
37	ALT0	JM43	-2,273.18	43830	Probably a date value
38	ALT1	JM43	-2,263.70	43830	Probably a date value
39	ALT2	JM43	-2,373.70	43830	Probably a date value
40	ALT3	JM44	-2,004.99	43830	Probably a date value
41	S65targetQseries	AA16; AB16; AC16; AD16;	0	41639	Probably a date value
42	StageStoArea	C11; E11; G11; I11; J11; K	0	4,126,219.75	H59
43	DATAforUKOPS	D10; D11; D12; D13; D14;	0	41639	Probably a date value
44	UKISSforUKOPS	C11; G11; I11; C12; G12; I	0	41639	Probably a date value
45	AFETforUKOPS	C11; D11; F11; G11; I11; J	0	41639	Probably a date value
46	Notes	A73	1	1	A73

4 General

Report generated:
16 days, 15 hours and 49 min ago

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D Wasted Space

Sheet No.	Sheet Name (link)	Columns used	Rows used	Last cell with data on sheet (link)	Last cell on sheet (CTRL+ END) (link)	Wasted Space: Column waste	Wasted Space: Row waste
						93	483
1	GUI	43	37	AQ37	AQ47	0	10
2	KCHops	118	423	DN423	DN446	0	23
3	TOHops	106	423	DB423	Same as last cell with data	0	0
4	ETOops	106	423	DB423	Same as last cell with data	0	0
5	HMJops	51	423	AY423	Same as last cell with data	0	0
6	MPJops	51	423	AY423	Same as last cell with data	0	0
7	ALCops	51	423	AY423	Same as last cell with data	0	0
8	GENops	51	423	AY423	Same as last cell with data	0	0
9	KCHsim	139	17956	EI17956	FF17956	23	0
10	TOHsim	155	17960	EY17960	Same as last cell with data	0	0
11	ETOsim	155	17956	EY17956	EY17957	0	1
12	HMJws	39	17907	AM17907	Same as last cell with data	0	0
13	MPJws	39	17907	AM17907	Same as last cell with data	0	0
14	ALCws	39	17907	AM17907	Same as last cell with data	0	0
15	GENws	39	17907	AM17907	Same as last cell with data	0	0
16	TSplots	81	77	CC77	Same as last cell with data	0	0
17	Events	63	18117	BK18117	Same as last cell with data	0	0
18	MaxStages	24	17902	X17902	X17905	0	3
19	StageDur						
20	FlowDur						
21	BoxWhiskerStage						
22	BoxWhiskerFlow						
23	Data4BWplots	92	125	CN125	CT125	6	0
24	Data4TSplots	83	17907	CE17907	DA17911	22	4
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27	StagePercsETO	25	15	Y15	Y40	0	25
28	FlowPercsS65	1	1	A1	Same as last cell with data	0	0
29	FlowPercsS61	1	1	A1	Same as last cell with data	0	0
30	FlowPercsS59	1	1	A1	Same as last cell with data	0	0
31	WatBuds	51	61	AY61	AY68	0	7
32	WS_Table	31	64	AE64	Same as last cell with data	0	0
33	S65VolComp	15	97	O97	Q97	2	0
34	OverlayKCH	33	35	AG35	Same as last cell with data	0	0
35	OverlayTOH	33	35	AG35	Same as last cell with data	0	0
36	OverlayETO	33	35	AG35	Same as last cell with data	0	0
37	ALT0	413	17904	OW17904	Same as last cell with data	0	0
38	ALT1	413	17904	OW17904	Same as last cell with data	0	0
39	ALT2	413	17904	OW17904	OW17927	0	23
40	ALT3	413	17937	OW17937	Same as last cell with data	0	0
41	S65targetQseries	31	17917	AE17917	Same as last cell with data	0	0
42	StageStoArea	19	59	S59	Same as last cell with data	0	0
43	DATAforUKOPS	23	17911	W17911	W18273	0	362
44	UKISSforUKOPS	10	17911	J17911	T17911	10	0
45	AFETforUKOPS	10	17911	J17911	O17911	5	0
46	Notes	2	116	B116	AA116	25	0

APPENDIX E:
2009 PEER-REVIEW REPORT

Scientific Peer Review of the Draft Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes

By:

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Department of Biology
North Carolina State University
Raleigh, North Carolina

J. David Allan, Ph.D.
School of Natural resources and Environment
University of Michigan
Ann Arbor Michigan

Barbara L. Bedford, Ph.D.
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Michael W. Collopy, Ph.D.
Academy for the Environment
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Reno, Nevada

Robert Prucha, Ph.D., P.E.
Integrated Hydro Systems, LLC
Boulder, Colorado

To:

South Florida Water Management District
3301 Gun Club Road
PO Box 24680
West Palm Beach, FL 33416-4680

Date:

April 17, 2009

TABLE OF CONTENTS

EXECUTIVE SUMMARY

The South Florida Water Management District (SFWMD) is undertaking the reservation of water for the Kissimmee River and the Kissimmee Chain of Lakes. A water reservation is a legal mechanism to set aside water for the protection of fish and wildlife or the public health and safety from consumptive water use. The reservation is composed of a quantification of the water to be protected, which includes both seasonal and location components for the protection of fish and wildlife in the Kissimmee River and the Kissimmee Chain of Lakes. Eight specific water bodies are the subject of the proposed water reservations, including the Kissimmee River and its floodplain (treated as a single reservation water body), and seven Chain of Lakes Reservation Water Bodies (Myrtle-Preston-Joel, Hart-Mary Jane, East Tohopekaliga, Tohopekaliga, Alligator Chain of Lakes, Gentry, and Kissimmee-Cypress-Hatchineha).

The "*Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes*", which the Peer Panel reviewed, describes the technical information used by SFWMD to establish the relationship between lake and river hydrology and its associated effects on fish and wildlife. The peer review was conducted in support of the SFWMD rule development process for establishing eight water reservations in the Kissimmee basin. The Peer Review Panel was charged with determining if the technical information contained within the technical document and other supporting documents, can be used as a scientific basis for quantifying water needed for the protection of fish and wildlife.

The Peer Review Panel determined that the supporting data and information used to develop the draft *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes* are technically sound and the inferences and assumptions made regarding the linkages between hydrology and the protection of fish and wildlife are based upon sound scientific information. Hydrologic models and analyses are well developed and documented, and the AFET-W model appears to reproduce observed surface and groundwater flow conditions satisfactorily for their intended application in developing performance measure hydrographs, which represent the annual pattern of water levels to protect fish and wildlife. The document uses appropriate hydrologic performance measures and supports their use with a thorough understanding of current scientific knowledge of wetland hydrology as related to fish and wildlife requirements, and with appropriate empirical observations and data where available.

The relationship between water levels and the condition of the broadleaf marsh, for the Kissimmee River and floodplain, and the pattern and extent of littoral zone inundation, for the Kissimmee Chain of Lakes, are well developed and these aquatic plant communities serve as suitable indicators for the protection of fish and wildlife. The Panel noted that considerable data are available on other taxa, especially fish and birds, facilitating the use of performance measures in hydrograph development and setting expectations for fish and wildlife responses. However, less information is available for the Chain of Lakes than for the Kissimmee River and its floodplain.

The Panel finds that the range in acceptability associated with reducing the seasonal low from the 90th to the 50th percentile would provide equivalent protection of fish and wildlife in the majority of water reservations, with the exception of the Kissimmee-Cyprus-Hatchineha, where reduction to the 50th percentile would result in an excessive decline in littoral zone inundation and thus reduction in protection of fish and wildlife.

The Peer Review Panel recommends that future efforts be directed at explicitly quantifying the link between hydrologic performance measures and fish and wildlife protection. These data can be used to provide direct support for the assertion that broadleaf marsh is a reasonable surrogate for the link between hydrology and fish and wildlife protection. In addition, more attention to the wet prairie may be of value as an indicator of hydroperiod restoration at the upper extent of the floodplain. Further development of environmental indicators as well as greater monitoring would be helpful for the Kissimmee Chain of Lakes. Continuing to monitor the littoral zone, as well as wading birds and species of conservation concern, is appropriate, and, if feasible, monitoring of the fish species assemblage as an indicator should receive greater effort. The Peer Review Panel believes that the margin of error associated with the estimation of flow and stage can be combined with the range of acceptability associated with the biologic performance measures to show that the hydrologic uncertainty is small compared to the range of acceptability associated with biologic performance measures. The Panel recommends that SFWMD undertakes this exercise, but cautions that the results should be interpreted as relative rather than absolute measures of uncertainty. Finally, the Panel suggests expanding the conclusions section on page 7-51 to more explicitly summarize findings with respect to water needed for protection of fish and wildlife.

INTRODUCTION

Regulatory Overview

The South Florida Water Management District (SFWMD)'s Governing Board authorized the development of rules for the reservation of water to protect fish and wildlife in the Kissimmee River, its floodplain, and the Kissimmee Chain of Lakes in June 2008. A water reservation is a legal mechanism (Section 373.223(4), Florida Statutes) to set aside water for the protection of fish and wildlife or the public health and safety from consumptive water use. The reservation is composed of a quantification of the water to be protected, which includes a seasonal and a location component. Eight specific water bodies are the subject of the proposed water reservations, including the Kissimmee River and its floodplain (treated as a single reservation water body), and seven Chain of Lakes Reservation Water Bodies (Myrtle-Preston-Joel, Hart-Mary Jane, East Tohopekaliga, Tohopekaliga, Alligator Chain of Lakes, Gentry, and Kissimmee-Cypress-Hatchineha).

In response, the SFWMD has produced a draft *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes*. The technical information and recommendations in this document serve as the basis for the quantification of water, as well as its seasonal distribution and location, for the protection of fish and wildlife that will be adopted through the rulemaking process.

The SFWMD's Governing Board has determined that peer review of proposed reservations is, as a matter of policy, a preferred step in developing water reservation rules. Accordingly, this peer review report summarized the panel's evaluation of the scientific and technical adequacy of the *Technical Document*.

Project Background

The Reservation Water Bodies in the Kissimmee Basin are located in central Florida just south of Orlando and extending to the Kissimmee River's confluence with Lake Okeechobee. The Upper Basin consists of the Kissimmee Chain of Lakes (KCOL) including Lake Kissimmee, all interconnected today by canals with nine water control structures that regulate flow. The Kissimmee River and its floodplain extend from Lake Kissimmee to Lake Okeechobee and, like the Upper Basin, have been highly altered since 1954 by the Central and South Florida Flood Control Project authorized by Congress in 1949. Between 1962 and 1972 the entire river was channelized, greatly increasing its depth and width and reducing its length from 103 to 56 miles. These changes essentially eliminated the historic flooding patterns that had created and maintained the fish and wildlife habitat of its floodplain. Restoration began in the early 1990s, and by 2001 Phase 1 was completed with the backfill of 7.5 miles of canal. In association with this restoration activity, extensive data on 25 ecological performance measures have been collected by the District under the Kissimmee River Restoration Evaluation Program (KRREP), including data on hydrology, vegetation, other biological variables, and various physical and chemical factors.

Purpose

The purpose of this peer review is to determine if the technical information contained in the draft report (*Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes*) is based on the best available information and can be used as a scientific basis for quantifying water needed for the protection of fish and wildlife within the eight water reservation water bodies. For the purposes of this peer review, water for protection of fish and wildlife means water for "ensuring a healthy and sustainable, native fish and wildlife community; one that can remain healthy and viable through natural cycles of drought, flood, and population variation" (Association of Florida Developers v. Department of Environmental Protection, Case No. 04-0880RP, Final Order at 17). The fish and wildlife for which a water reservation may be established are existing native communities of fish and wildlife that would use the habitat in its restored state.

The *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes*, which this Peer Review Panel reviewed, summarizes the technical and scientific data, assumptions, models, and methodology used to support rule development to reserve water for the protection of fish and wildlife for specific water bodies located in the Kissimmee Basin. The information contained in this document includes: 1) an introduction to its purpose; 2) an explanation of water reservations; 3) identification and description of the reservation water bodies; 4) fish and wildlife resources, hydrologic requirements, and performance measures for the Kissimmee River and its floodplain; 5) fish and wildlife resources, hydrologic requirements, and performance measures for the Kissimmee Chain of Lakes; 6) hydrologic modeling for the Kissimmee Basin; and 7) quantification of water for the protection of fish and wildlife. In sum, this document describes the quantification of water, as well as its seasonality and location, to be reserved under state law in the Kissimmee Basin.

The Statement of Work is attached as Appendix A.

Peer Review Panel

The Peer Review Panel was composed of five scientists with backgrounds that complemented the scientific and technical subject areas and analyses that were relevant to rule development to reserve water for the protection of fish and wildlife in specific water bodies located in the Kissimmee Basin. The panel members were: J. David Allan, Ph.D. panel chair, (aquatic ecologist with expertise in ecological assessment and restoration); D. Derek Aday, Ph.D. (aquatic ecologist with expertise in fish ecology and fisheries biology); Barbara L. Bedford, Ph.D. (wetland ecologist with expertise in plant ecology, hydrology, and biogeochemistry), Michael W. Collopy, Ph.D. (wildlife biologist with expertise in avian ecology); and Robert Prucha Ph.D., P.E., (water resources engineer and hydrogeologist with expertise in integrated hydrologic modeling).

The Peer Review Panel conducted all of its work according to the terms of the Florida sunshine law. All meetings and communications among panelists were held at a noticed

open meeting or through the SFWMD WebBoard, which is available for public viewing at http://webboard.sfwmd.gov. The Panel participated in aerial and ground tours of the Kissimmee River and Chain of Lakes. Public deliberations among panel members and District scientists encompassed one and a half days, which was followed by the preparation of this peer review report.

This peer review was conducted in support of the SFWMD rule development process for establishing eight specific water reservations for the Kissimmee River and Kissimmee Chain of Lakes. The Peer Review Panel was charged with determining if the technical information contained within the *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes* and other supporting documents can be used as a scientific basis for quantifying water needed for the protection of fish and wildlife.

The Panel focused its review on the information contained in the draft *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes* prepared by the SFWMD, which describes the methods used to support the water reservation rules for the eight water bodies. The Panel was also provided supplemental technical documents (viewable on the WebBoard) to facilitate making an assessment of whether best currently available technical information supports the relationship between the recommended water reservations and the anticipated fish and wildlife response. The Panel also requested that additional information, which was met by the SFWMD in a timely manner, be provided in response to the Panel's concerns.

PEER REVIEW COMMENTS

Panel Response to SFWMD Technical Questions

1. Do the environmental indicators selected provide the basis for protecting fish and wildlife in terms of ensuring sustainable native communities through natural cycles of drought, flood, and population variation?

Findings:
Kissimmee River and floodplain: For the Kissimmee River, the Technical Document summarizes extensive information for multiple components of the ecosystem, including vegetation and all vertebrate groups, indicating broad and thorough coverage of important environmental indicators. Three types of emergent herbaceous marsh (broadleaf marsh, wet prairie, and wetland shrub) are primary indicators of floodplain conditions, with particular emphasis on broadleaf marsh. Vegetation mapping over time and in combination with elevation and hydroperiod data provide a strong basis for monitoring vegetation. The Panel agreed that, given existing data, these are suitable indicators and also reasonable proxies for other fish and wildlife. However, the committee noted that a stronger empirical basis for tying fish to emergent vegetation should be acquired. Fish of the Kissimmee River also are a key environmental indicator both as an important biological assemblage and as a food supply for reptiles, birds, and mammals, and monitoring of the fish assemblage is extensive. Amphibians and reptiles appear less well known, as do mammals, whereas birds are better studied, particularly species of conservation concern and wading birds, both of which are appropriate. In the less well known groups, however, species lists and literature review adequately convey existing knowledge.

In response to reviewer questions, the District made available "Restoration Expectations for the Kissimmee River Restoration Project" (Appendix B). The specific expectations listed for plant communities, aquatic invertebrates, amphibians and reptiles, fish, and birds provide specific examples of indicators (e.g., wetland plant communities will cover > 80% of restored floodplain; fish targets at < 1% for bowfin, <3% for Florida gar, > 58% for centrarchids; long-legged wading birds > 30.6 km^{-2} on the restored floodplain). These are excellent indicators as well as specific expectations of success.

Kissimmee Chain of Lakes: Less specific information is available on which to identify environmental indicators for the seven water bodies of the KCOL under consideration. In the case of these water bodies, given the control of lake levels under the existing USACOE regulation schedule, this committee understood the goal to be maintaining the current characteristics of the lakes without further degradation, at least until the new regulation schedule is released by the USACOE. These characteristics have developed since the 1960s when the current regulation schedule was put in place, and reflect the diminished lake level fluctuations relative to those that occurred prior to regulation. The littoral vegetation that has developed under regulation is the key environmental indicator being used in this rule development. Vegetation is classified into seven categories, which differ in their representation among the seven lakes as a function of each lake's

bathymetry. Although the Technical Document does not provide a great deal of guidance on how to evaluate each vegetation category, the committee's sense is that maintaining the extent of submerged aquatic vegetation and total littoral zone area, and limiting the presence of the invasive species, *Hydrilla verticillata*, are of particular importance. Given that the regulation schedule is set by the USACOE and not by the District, this approach is reasonable until the new schedule is determined. The fish assemblage contains species that are valuable from a recreational fishery standpoint, and there is adequate information on species composition, including trophic and habitat categorization and spawning season for many species based on the literature. Species lists are available for amphibians, reptiles, and mammals. Birds are better known, including the wading bird assemblage and three species of conservation concern (Everglades Snail Kite, Florida Sandhill Crane, and American Bald Eagle).

In summary, the Panel finds that that the Technical Document uses appropriate environmental indicators to provide the basis for protecting fish and wildlife. For both the River and the KCOL, multiple indicators are included, giving assurance that the broad needs of the ecosystem are met.

Recommendations:
It would be useful to have a table of indicators so that all are readily accessible. This would allow reviewers to offer more specific advice regarding development of potential metrics or additional indicators.

More attention to the wet prairie may be of value as an indicator of hydroperiod restoration at the upper extent of the floodplain.

A stronger empirical basis for tying fish to emergent vegetation should be acquired.

2: Are there any major environmental indicators not considered in our analysis that could significantly affect the quantity, timing, and distribution of water identified for protection of fish and wildlife?

Findings: The Panel agrees that the environmental indicators selected by District staff are entirely reasonable from a scientific perspective given current scientific understanding and data. As far as the panel could determine, no data exist that would indicate that any major additional indicators would affect the quantity, timing, and distribution of water identified for protection of fish and wildlife. The selected indicators are based on sound and extensive scientific knowledge of the systems at issue. However, an explicit list of the indicators in table format would make it easier for reviewers to determine if other indicators might be appropriate as more information about the systems becomes available.

Kissimmee River and floodplain: In the panel discussion with scientists from the SFWMD on day one, it was apparent that studies of the Kissimmee River associated with the restoration work provided a wealth of data, and that these studies were carried out in a highly professional manner. The Peer Review Panel did not find any significant

shortcomings in the selection of environmental indicators for the purpose of establishing water needed to protect fish and wildlife. There may be groups that should be monitored to develop additional baseline data and insight into system function, and there may be computational approaches using existing data that provide greater insight into the response of targets. These suggestions will appear under recommendations associated with other questions, especially Question 9.

Kissimmee Chain Of Lakes: Because the KCOL are less intensively monitored than the River, additional monitoring of fish and wildlife populations, which based on information presented to the Panel does not appear to be extensive, could be considered in future work.

<u>Recommendations:</u>

Further development of environmental indicators as well as greater monitoring would be helpful for the KCOL. Continuing to monitor the littoral zone, as well as wading birds and species of conservation concern is appropriate, and, if feasible, use of the fish assemblage as an indicator should receive greater effort (see Question 9). A detailed table of indicators would be useful for scientists and policy makers interested in monitoring the success of these water reservations.

3A. Do the performance measures adequately represent the hydrologic requirements of fish and wildlife identified for protection?

<u>Findings:</u> Insofar as the District used the best scientific information, empirical data, and modeling tools available, and was operating under three identified constraints on the water available for the system, this committee thinks that the performance measures selected do adequately represent the hydrologic requirements of fish and wildlife identified for protection. Those three constraints (p. 1-8) are: (1) the existing Kissimmee Chain of Lakes (KCOL) regulations schedule set by the USACOE, which narrowed the range of water level fluctuations in the lakes and thereby reduced the quantity and quality of habitat for fish and wildlife; (2) the Headwaters Revitalization Regulation schedule for Lakes Kissimmee, Cypress, and Hatchineha; and (3) fully restoring the Kissimmee River and floodplain. These constraints impose limitations on restoring historic water flows, water level fluctuations, and seasonal and inter-annual variation to the KCOL. In addition, until more of the Kissimmee River restoration is completed, the USACOE cannot fully implement the Headwaters Revitalization schedule or restore historic hydrologic patterns to the Kissimmee River and its floodplain. The document clearly is based on understanding those three constraints and on sound conceptual understanding of the systems of concern, as well as on an impressive amount of empirical observations and data.

The document shows a sophisticated understanding of wetland hydrology in explicitly recognizing the various components of wetland hydrology – magnitude of flow, rates of change of flow and water levels, timing (seasonality) of flows and levels with respect to

biota of concern, and duration and frequency of flows and levels. The document also recognizes that all of these components must be addressed in order to maintain, in the case of the KCOL, and restore, in the case of the Kissimmee River and its floodplain, the natural dynamic (spatially and temporally) mosaic of wetland communities in these systems and the fish and wildlife they support. District staff have used the best available scientific understanding and data on the linkages between hydrologic characteristics and specific organisms or groups of organisms (e.g., plant communities, fish communities, species of special concern). Their emphasis on flows, timing, and recession rates is appropriate.

3B. Do the 'range of acceptability' values proposed provide equivalent levels of protection for fish and wildlife?

Findings: There was considerable discussion among panel members about use of the word 'equivalent', particularly within the context of the headwater lakes portion of the Kissimmee Chain of Lakes (KCOL). There was strong general agreement that the range of acceptability values proposed in the technical document would, indeed, provide equivalent and adequate protection for fish and wildlife in the Kissimmee River (KR). In this case, performance measures included KR Flow (R-01), KR Stage Hydrograph/Floodplain Hydroperiod (R-02), and KR Stage Recession/Ascension (R-03). The target values and boundaries presented for these performance measures are clearly based upon sound scientific information and reasonable hydrologic assumptions. The link between hydrology and broadleaf marsh is particularly well supported; the link between broadleaf marsh and fish and wildlife protection is intuitive and conceptually sound, if somewhat lacking in empirical support. District biologists have a strong dataset on the Kissimmee River resulting from the restoration project and evaluation program, and the performance measures for quantification of fish and wildlife needs have already been externally reviewed. As such, the Panel is in full agreement that the range of acceptability values for the Kissimmee River provide equivalent levels of protection for fish and wildlife.

Panel members also agreed that the range of acceptability values in the Kissimmee Chain of Lakes provide equivalent levels of protection for fish and wildlife, with one caveat. The focus of KCOL analyses was 'performance measure hydrographs' for the seven reservation water bodies. The range of acceptability values come from sensitivity analyses associated with lowering the seasonal low of the performance measure hydrograph from the 90th to the 50th percentile of water levels on May 31 (based on historical data). To this end, the analyses considered important metrics such as recession and ascension rate, reduction in lake area and volume, and littoral zone inundation. Remarkably, reducing the seasonal low from the 90th to the 50th percentile resulted in little change in these systems, and the Panel expressed broad agreement that the range in acceptability values would provide equivalent protection of fish and wildlife. The notable exception was associated with Kissimmee-Cyprus-Hatchineha, where dropping the seasonal lows would result in a 1.7-foot decrease in water level. Of particular concern among panel members was the resulting drop in littoral zone inundation; at the 90th

percentile, 90% of the littoral zone would remain inundated, whereas only 41% would remain inundated if the seasonal low was dropped to the 50th percentile. This is a significant change in littoral habitat for a system that already has the lowest percent littoral area (22%) of the reservation lakes (Table 5-10). Given the importance of littoral habitat to fish and wildlife (fish and vegetation, in particular), in the case of Kissimmee-Cyprus-Hatcheniha the Panel disagrees with the assertion that the range of acceptability values provides equivalent protection of fish and wildlife. With that caveat in mind, the Panel expressed agreement that the performance characteristics were based on sound science and reasonable assumptions, and that the range of acceptability values were reasonable and acceptable given the ecology and hydrology of the KCOL.

<u>Recommendations:</u>

Continued monitoring of the fish and wildlife communities in the KR and the KCOL is recommended. The Panel also recommends that data to better establish the link between fish and wildlife protection and hydrology be collected and evaluated. See also response to Question 9.

4. Are the hydrologic methodologies, models, analyses, and assumptions sufficiently supported by available scientific knowledge, research and data?

<u>Findings:</u> Hydrologic analyses conducted in this study relied largely on the use of a model developed using the fully integrated, physically-based hydrologic code referred to as MIKE SHE/MIKE 11. This code simulates all of the natural primary hydrologic processes that occur within the Kissimmee Basin using standard physically-based equations and allows flexible coupling between these processes, including fully-hydrodynamic channelized flow, two-dimensional overland flow, unsaturated zone flow, evapotranspiration and three-dimensional saturated zone flows. Model simulations are driven by external boundary conditions, such as rainfall and RET, and MIKE SHE allows significant flexibility in specifying input to the spatial and temporal input of this information. In fact, most parameters within the model can be specified as spatially variable. This code represents a valid tool for use in this analysis.

The AFET-W fully-integrated MIKE SHE/MIKE 11 model and the KRFHM floodplain hydraulic model (MIKE 11 model) as developed for this study are sufficiently supported by available scientific knowledge, research, and data. This report does not detail the considerable effort involved in preparing the earlier AFET model, but does provide appropriate references to this information. The AFET-W model represents a highly parameterized hydrologic flow model, which can increase the non-uniqueness of the solution. However, in most instances a physical basis for the parameter values and their distribution has been provided and thoroughly documented. In addition, the coupling of the various processes, such as channel or overland flow with unsaturated and saturated flows, provide considerable additional constraints on the parameterization compared to simulating flows using single-process codes.

The use of a spatially-variable RET time series in the AFET-W model and quantitative calibration to available groundwater data represent an improvement over the previous AFET model. Details of this calibration were somewhat limited in this report, but review of the AFET-W model calibration report (*Earth Tech, 2008. AFET-W Calibration Report KCOL Surface Water Supply Availability Study*) showed calibration of surface and groundwater improved over the AFET model. Limitations of the model, for example the limited number of groundwater wells in the southern model area, are well documented in this report.

5. Do the hydrologic methodologies, models, analyses and assumptions described in the report yield sufficiently accurate results to reasonably support their applications as described in the report?

<u>Findings:</u> The AFET-W model is used as the primary hydrologic tool for analysis in this study. It is used to simulate “with project” base condition surface water stages and flows, and lateral inflows. It is also used to generate upper- and lower-river target time series of stages and flows.

The degree to which the AFET-W model reproduces observed surface water flows and stages and groundwater levels throughout the basin provides an indication of the accuracy of simulated results for the “with project’ base conditions. This model error appears to be small enough to reasonably support intended applications (Section 7). The AFET-W model meets most of the pre-defined calibration criteria for surface and groundwater (pages 6-9) as shown on Tables 6-1 to 6-3, though the model will never be able to exactly reproduce observed data due to error from a variety of sources. For example, some degree of error is expected in the measurement of input data such as rainfall or RET, in the conceptual or structural model framework (i.e., aquifer configuration, simplification of surface drainage, etc.), and in defining appropriate parameter values, most of which are spatially variable. Despite this inability to exactly reproduce observed system response, the AFET-W model appears to reproduce observed surface and groundwater flow conditions well enough for the intended application.

Uncertainty within the hydrologic modeling community is generally believed to be derived from three key areas; parameter, conceptual or structural, and data. Despite the increased uncertainty due to parameterization in the AFET-W model, most of the parameter values are physically based and carefully prepared and documented, and the benefit of using a model that incorporates all of the major hydrological processes is believed to greatly outweigh the inability to fully assess the model uncertainty. Plots showing the model margin of error (Figures 6-44 to 6-51) appear to be reasonable estimates of the predicted hydrologic modeling error associated with flow and stage.

<u>Recommendations:</u>

Revise the Draft Technical Document to discuss how the results of the margin of error, or model prediction uncertainty, will be used in Section 7.

6. Can/should the margin of error associated with the estimation of flow and stage as defined in this report be combined with the range of acceptability associated with the biologic performance measures, for the purpose of describing to policy makers boundaries within which they are equally sure (or unsure) that the desired protection of fish and wildlife will be achieved?

Findings: The margin of error associated with simulated flow and stages in the Kissimmee River and the Chain of Lakes can and should be used to assess the impact of modeling uncertainty on the estimated volume of water required for protection of fish and wildlife. This would provide greater confidence (and transparency) that the reported targets/thresholds will protect fish and wildlife, at least within the range of hydrologic model uncertainty. It would also be useful to show that conclusions reached in this report will not be significantly affected by results of hydrologic analysis. Finally, it would validate the use of the AFET-W model in this type of application.

Recommendations:

The Peer Review Panel believes that the calibrated AFET-W model margin of error can be incorporated into final target time series relatively easily and with the information already provided in the report. For example, the margin of error calculated as upper and lower bounds around predicted "with project" stages on the duration curves for various structures (i.e., Figures 6-44 through 6-51, on pages 6-78 to 6-81) could be translated onto the lake and river target time series plots prepared in either the Preliminary Analysis Section 7 (i.e., Figures 7-23 to 7-29 for lakes, and Figures 7-30 to 7-34 for river). Additional upper-lower bounds may have to be generated for some of these figures. Because the Detailed Analysis accounts for the timing of events and yields more water, an effort should also be made to show how tables like 7-10 would change. The margins of error were calculated on a monthly basis to avoid the short-term daily offsets in flow and stage. Either daily or monthly average errors could be used to revise the estimates given in Table 7-10.

7. Are the methodologies used to develop the Target Time Series for the river and for the lakes scientifically and technically valid, given the constraints of the initial reservation?

Findings: The methodologies used appear to be valid, given the constraints of the initial reservation (i.e., existing KCOL operating schedule in the upper basin, the Headwater Revitalization Project in the headwaters of the Kissimmee, and a fully-restored Kissimmee River).

The steps for developing the lake target time series are relatively straightforward, in that the seasonal high stage was related to the high pool regulatory stage for each reservation water body, thereby protecting all of the fish and wildlife habitat possible. A range of seasonal lows was also developed for each water body, using upper and lower threshold

values (90th and 50th percentile, respectively). Stage hydrographs were used to show the range of water required for the protection of fish and wildlife. In three of the reservation water bodies, species- or taxa-specific requirements were used to create a third stage in the hydrograph. These modifications were inserted to accommodate specific hydrologic needs during the nesting season of wading birds at Bird Island Rookery (at Lakes Hart and Mary Jane) and apple snails at Lakes Tohopekaliga and Kissimmee, Cypress and Hatchineha. These modifications appear to sufficiently adjust the recession rates to accommodate the life history requirements of these particular species.

In contrast, the steps for the Kissimmee River are more complex and somewhat difficult to follow. However, after reviewing two additional documents provided by SFWMD on how upper and lower targets for the Kissimmee River were determined, the Panel agreed that, while the methodology had many steps, it was well documented.

Given the importance of developing a reasonable target time series that meets performance measures R-1 to R-3, it seems unclear what sort of error is associated with the final set of Kissimmee River target time series. In other words, because the target time series are hypothetical and non-unique, if a starting point other than the "with project" base conditions time series was used with the "trial and error" methodology, how different would the resulting upper and lower target time series be from those estimated in this report, if at all? This could be clarified in the report. Part of this may be due to the difficulty following the series of steps.

It seems unclear why a preliminary and more detailed method is presented in Section 7, when the results of detailed analysis point out that the preliminary method doesn't consider timing of events, and more water appears available if daily timing is considered.

Recommendations:

Given the "trial and error" methodology used to develop upper and lower target time series for the Kissimmee River, it would be helpful to clarify why using starting conditions other than the "with Project" base conditions would not produce significantly different results.

The report should clarify why upper and lower targets are defined using a different set of performance measure components.

The report should clearly indicate which set of results (preliminary or detailed analysis) decision-makers should rely on to define the water needed for protection of fish and wildlife. For example, in the case of the lakes, the detailed analysis (Table 7-10) shows considerably more water available than the preliminary analysis (Table 7-9). If results from the more detailed analysis are more realistic and accurate, the discussion of the preliminary analysis should be removed to avoid possible confusion.

8. Is the water identified for the protection of fish and wildlife technically supported for each of the eight reservation water bodies?

Findings: The document clearly distinguishes the water needs of the eight reservation water bodies and appropriately identifies them given the identified constraints (see 3A above). As discussed under Question 3A, the document uses appropriate hydrologic performance measures and supports their use with a thorough understanding of current scientific knowledge of wetland hydrology as related to fish and wildlife requirements, and with appropriate empirical observations and data where available. The modeling tools used appear to be at the cutting edge of current modeling practice and extend the available knowledge by integrating the hydrology of the several water bodies, where appropriate, to obtain a more thorough picture of the entire Kissimmee system. Furthermore, the modeling tools used have been developed in such a way that they can be adapted as the USACOE adopts new water regulation schedules and the Kissimmee restoration is completed.

9. What additional work, if any, should be considered to enhance the technical criteria for future updates of these water reservations?

Recommendations:

The Panel was impressed with the clarity and comprehensiveness of the technical document and there was broad agreement that the science linking hydrology to vegetation characteristics (especially broadleaf marsh) was particularly strong. Furthermore, current scientific understanding and data would support the assumption by District staff that vegetation is a strong surrogate for "habitat quality" for fish and wildlife. The Panel strongly suggested, however, that future effort be directed at explicitly quantifying the link between fish and wildlife and hydrology. These data can be used to provide direct support for the assertion (widespread in the technical document) that broadleaf marsh is a reasonable surrogate for the link between hydrology and fish and wildlife protection. To that end, there are many acceptable ways to collect and analyze relevant data. Among these, the Panel suggests the following: 1) continuous vegetation monitoring in the Kissimmee River; 2) continued data collection on the specific species (e.g., wading birds, apple snails) that were used to modify target time series in the KCOL; 3) selection and monitoring of specific fish and wildlife indicator species in the Kissimmee River and KCOL to ensure that project goals associated with protection of fish and wildlife are being met; and 4) continued monitoring of species composition for fish and wildlife in the Kissimmee River and KCOL. From these data collections, metrics that track populations (e.g., size, age structure, etc.) and communities (e.g., relative abundance, species evenness and richness, beta diversity, etc.) can be calculated through time to ensure ongoing protection of fish and wildlife in the Kissimmee River and KCOL. The Panel suggests that, if possible, additional data collections be focused specifically on amphibians. However, the Panel recognizes significant constraints associated with collecting those data.

The Panel also recommends that hydrologic uncertainty in the "with Project" base condition simulations be incorporated into the detailed target time series in Section 7. Doing so should demonstrate that even with the hydrologic uncertainty noted on Figures 6-44 to 6-51, conclusions related to the amount of water available above target time series will not change significantly.

10. Does the compiled information, including data, analyses, assumptions, and literature review, provide a reasonable basis for the conclusions reached about the water needed to protect fish and wildlife for each of the eight reservation water bodies?

The Panel is in unanimous agreement that the compiled information provides a reasonable basis regarding water needed to protect fish and wildlife for each of the eight reservation water bodies. The documentation is extremely comprehensive, well organized, intuitive, and conceptually sound. Ostensibly, the goal of this peer review panel is to identify data gaps or flaws in logic that prevent agreement with conclusions reached by SFWMD scientists. In all instances, however, questions regarding clarification of concept or methodology were readily addressed by District biologists and additional material was provided, when necessary, to support those responses (e.g., supplemental material available through the WebBoard). There was discussion among panel members and District biologists regarding the meaning of "protection of fish and wildlife", and panelists' questions were answered and concerns about how to quantify protection were resolved. Additional discussion focused on the use of broadleaf vegetation as a surrogate for the link between hydrology and fish and wildlife protection, and suggestions for strengthening that link are included in Question 9.

The presentation of the technical documentation was thorough and appropriate. However, the Panel does suggest expanding the conclusions section on page 7-51 related to water needed for protection of fish and wildlife. Given that this is the focus of the water reservation, additional detail in this section would be useful to bolster the case that these water reservations provide adequate protection of fish and wildlife, and would aid policymakers that might be less familiar with, or interested in, specific details.

The conclusion section should be very clear on the quantity of water required for protection of fish and wildlife. The discussion of results in Section 7 and the conclusions focus mostly on the amount of water available above that needed for protection of fish and wildlife. Conclusions could be improved by tabularizing the quantities of water needed for protection of fish and wildlife in each of the eight water bodies defined on pages 1-2 combined with estimates of hydrologic modeling uncertainty described in the response to Question 6. In addition, conclusions could also be improved by clarifying which set of analysis results decision-makers should rely on for assessing the amounts of water available above reservation needs. For example, results of the detailed analysis appear more realistic and indicate considerably more water is available than the preliminary analysis. To avoid potential confusion, the report should clearly show decision-makers how to use results of the preliminary and detailed analysis (i.e., tables 7-9 and 7-10). If results of the more detailed analysis are more realistic than results of the

preliminary analysis, the discussion and results of the preliminary analysis could be removed. Finally, Tables 7-9 and 7-10 and Figures 7-23 to 7-34 should also be modified to reflect the approximate range of uncertainty in the “with Project” base condition simulation.

In the technical document, reference is made to the wildlife response already observed along the partially-restored sections of the Kissimmee River. Given the reliance of the overall approach to reestablishing the linkages between hydrology, vegetation, and fish and wildlife, it would be helpful if documentation of these responses could be provided. A useful place to insert relevant data summaries and explanatory text to support these initial observations would be in Technical Report Appendix A (Kissimmee River Restoration Project Background). These preliminary findings would support the statement in the document and provide more detailed information to the reader regarding fish and wildlife responses to restoration that have been documented to date.

OVERALL FINDINGS AND RECOMMENDATIONS

The Peer Review Panel commends the District staff for preparing a report that summarizes a large quantity of data and analyses, produced from many studies, into a document that is coherent and logical in its flow. In addition, the Panel found the site visit invaluable, including the tour of Lake Toho and particularly the helicopter tour of the Kissimmee Chain of Lakes and Kissimmee River. Without this aerial tour it would have been difficult for the panelists to fully comprehend the spatial extent of the combined waterways, their interconnectedness, and the extensive floodplain area of the restored Kissimmee River. The establishment of water reservations for the eight water bodies of the Kissimmee basin is a challenging task due to the complexity of linking hydrology to fish and wildlife resources, as well as the legal, social, and economic constraints of recommending a water resource use strategy for such complex and coupled ecosystems.

The supporting data and information used to develop the draft technical report are technically sound, and the inferences and assumptions made regarding the linkages between hydrology and the protection of fish and wildlife are based upon sound scientific information. The premise of the draft technical report is that the hydrologic requirements of the existing fish and wildlife resources can be expressed as a performance annual hydrograph that represents the annual patterns of water levels needed to protect fish and wildlife for each reservation body. This is accomplished for the Chain of Lakes by specifying seasonal high and low stages, connecting these with ascension and recession events, and adjusting the resulting hydrograph in accord with the specific hydrologic requirements of fish and wildlife in individual lakes. In the case of the Kissimmee River and its floodplain, this is accomplished through the use of flow and stage duration curves at specific water control structures.

Regarding the sufficiency of literature and data supporting the draft technical report, the Panel noted that the data presented was scientifically sound but at times was insufficient to support the various linkages that are critical to establishing that fish and wildlife are adequately protected. The panel agreed that the District utilized the best available scientific knowledge and data to support the various linkages that are critical to establishing that fish and wildlife are protected. However, the panel also recognized that current understanding and data are insufficient for establishing these linkages more directly and for certain taxonomic groups. For example, while the hypotheses and assumptions linking hydrology to the protection of the broadleaf marsh are particularly strong, and a great deal of biological data are available for the Kissimmee River and floodplain, the Panel recommends that further effort be made to establish linkages between broadleaf marsh and fish and wildlife, or between hydrology and fish and wildlife, on an ongoing basis. This could include monitoring of vegetation in the Kissimmee River and its floodplain, of the extent of the littoral zone in the lakes, of specific species (e.g., wading birds, apple snails) that were used to modify target time series in the Chain of Lakes, of specific fish and wildlife indicator species in the Kissimmee River and Chain of Lakes, and of additional fish and wildlife in the

Kissimmee River and Chain of Lakes, including amphibians and reptiles for which information currently is sparse. Appropriate metrics that can be derived from such data include those that track populations (e.g., size, age structure, etc.) and communities (e.g., relative abundance, species evenness and richness, beta diversity, etc.)

Second, the Peer Review Panel believes that the margin of error associated with the estimation of flow and stage can be combined with the range of acceptability associated with the biologic performance measures to show that the hydrologic uncertainty is small compared to the range of acceptability associated with biologic performance measures. The Panel recommends that SFWMD undertakes this exercise, but cautions that the results should be interpreted as relative rather than absolute measures of uncertainty.

Third, the Panel suggests expanding the conclusions section on page 7-51 related to water needed for protection of fish and wildlife. Given that this is the focus of the water reservation, additional detail in this section would be useful to bolster the case that these water reservations provide adequate protection of fish and wildlife, and would aid policymakers that might be less familiar with, or interested in, specific details. The emphasis in the conclusions section should focus more on actual quantification of water needed for protection of fish and wildlife for the eight reservations, rather than on the amount available for other uses. The conclusions should also clearly describe why both preliminary and detailed analyses were conducted and how decision-makers should utilize this information. It was unclear why discussion of the preliminary analysis is needed if the more detailed analysis provides more realistic quantities.

APPENDICES

Peer Panel Statement of Work

Restoration Expectations for the Kissimmee River Restoration Project

APPENDIX A

STATEMENT OF WORK FOR PEER REVIEW OF TECHNICAL DOCUMENTATION TO SUPPORT DEVELOPMENT OF WATER RESERVATIONS FOR THE KISSIMMEE RIVER AND CHAIN OF LAKES

Date:	January 29, 2009
Project Name:	Kissimmee River Water Reservation
Peer Review Coordinators:	Jason Godin and John Zahina, Water Supply Planning Division Water Supply Department
Project Manager:	Lawrence Glenn, Kissimmee Division, Watershed Management Department
Requesting Offices:	Watershed Management and Water Supply Departments

1 Introduction

This request for peer review pertains to the draft project technical report entitled "Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes." This peer review is being conducted to support the rule development process for establishing a water reservation for the area encompassed by the Kissimmee Basin. The South Florida Water Management District (SFWMD) is a regional water resource protection and management agency with legal authorities identified by state law, specifically Chapter 373 Florida Statutes (F.S.). Pursuant to Section 373.223 F.S., the Governing Board of the SFWMD has directed staff to develop a reservation or allocation of water to protect water identified for the protection of fish and wildlife in the Kissimmee Basin.

The purpose of this peer review is to determine if the technical information contained within the draft technical report based on the best available information and other reference materials can be used as a scientific basis for quantifying water needed for the protection of fish and wildlife. For the purposes of this peer review, water for protection of fish and wildlife means water for "ensuring a healthy and sustainable, native fish and wildlife community; one that can remain healthy and viable through natural cycles of drought, flood, and population variation." (<u>Association of Florida Community Developers v. Department of Environmental Protection</u>, Case No. 04-0880RP, Final Order at 17). The fish and wildlife for which a water reservation may be set are existing native communities of fish and wildlife that would use the habitat in its restored state.

1.1 Peer Review Overview

The peer review panel shall read the draft technical report and related background information identified in this statement of work, participate in the technical workshop, submit written comments on the draft project technical report, and work with the panel chairperson to develop a final peer review panel. The panel chairperson shall submit a

comprehensive final peer review report to the SFWMD that meets the objectives noted above.

This review will include a response to the SFWMD questions asked of the panel, a summarization as to whether the panel agrees or disagrees with staff's estimation of water needed for protection of fish and wildlife, and recommendation of action to resolve outstanding technical issues. The expert panel is requested to provide specific recommendations to address deficiencies in the information presented in the document. Florida's Government-in-the-Sunshine Law requires that all discussion and interactions related to the peer review are conducted in a publicly accessible format, such that they should only take place at the peer review workshop or through the SFWMD web-board. The panel members shall have no direct or potential conflicts of interest and will comply with Florida Sunshine Laws (see section 1.2).

1.2 Panelist Requirements and Expertise

It is required that each panelist shall have the following skills:

- Expertise in one or more of the following: (1) freshwater wetland / plant ecology, (2) avian ecology, (3) riverine fish ecology, (4) lacustrine fish ecology, (5) hydrologic modeling, or (6) hydrology and hydrogeology linking freshwater flow (surface and groundwater) to ecological resources.
- Effective communication and writing skills
- Availability to dedicate significant time resources during the peer review period
- Availability to participate in the technical workshop
- Ability to conduct an objective and independent scientific review

In addition to the above requirements, the chairperson must also have excellent communication, writing, and report organization skills. Experience chairing peer review panels and consolidating comments from multiple panelists is preferred. It is preferred, but not required, that each panelist have a demonstrated ability to understand the potential impacts to the hydrologic system in the South Florida region from simulated changes in hydrologic conditions, operational guidelines, and management objectives.

The SFWMD has organized the peer review process in accordance with accepted scientific review practices. Care will be taken in selecting the panelists to assure they are independent of the SFWMD. Panelists should have no substantial personal or professional relationship with the SFWMD or any other organization involved in environmental management in Central Florida. The panel can therefore be reasonably assumed to be objective in evaluating materials presented. Such objectivity is the cornerstone of any true independent peer review process. Each panelist shall submit a signed disclosure of potential conflicts of interest and current curriculum vitae.

1.3 Guidelines for Peer Review

All panelists will receive payment for their participation on the panel. The chairperson shall have additional duties and will receive payment accordingly based on an estimate of additional hours for aggregating and reporting panel findings. All panelists shall attend a

one day field trip and 2-day workshop in Orlando, Florida (see Table 1). Once individuals have accepted their position and their contract is executed, they shall begin to review the project technical report and supporting reference materials provided in preparation for their participation in the public workshop. All notes and questions about the technical document from each panelist shall be recorded using the web board following the format in section 4.1.2. The workshop is a venue for panelists to work face-to-face with each other and staff and to ask questions and clarify any items as needed.

The web board serves as a repository to allow panelists to submit their comments on the draft project technical report and to distribute documents such as the peer review report. It also allows the SFWMD to disseminate other relevant information about the review, and it allows the general public to closely follow the development of the review. Discussions among panelists relating to this peer review shall occur only during the public workshops or through the web board.

Review of the technical documents by individual panel members shall be done independently prior to the public workshop. The panel will interact with one another to formulate a consensus of opinions at the public workshop. During the final workshop session the panel shall collaborate on recommendations and proposed changes to the technical document. The chairperson shall then write a final peer review report incorporating the SFWMD team responses and the panel's conclusions following the workshop.

The panel members will comply with s.286.011, F.S. (ATTACHMENT A) and therefore may not have discussions amongst each other outside the public forum. A publicly accessed web board provided by the SFWMD (Kissimmee River section of the Natural System Technical Document Peer Review Web Board: http://webboard.sfwmd.gov/default.asp?boardid=NSTDPR&action=0) shall provide the only means of communication between panel members outside of a public workshop. The peer review panel web board shall be used by the panelists and the public to post questions to the SFWMD Project Team and to post their work in progress following the format in section 4.1.2. This web board will be conducted in accordance with Florida's 'government in the sunshine' statutes. Panelists are required to read the information on the sunshine laws contained in ATTACHMENT A. Panelists may post materials, but may not respond to, or have discussions with, other members of the panel or have discussions via a liaison. SFWMD staff will provide a set of instructions for using the web board to each panelist.

2 Summary of Time Line and Responsibilities

Table 1: Time Line and Responsibilities

Task/Action	Responsible Party	Deliverable & Due Date for 2009
Execution of Purchase Order	Procurement	
Send Materials to Panelists	SFWMD	March 20, 2009
Task 1a: Acknowledgement of Receipt of Materials	Chairperson and panelists	Within 48 hours of receiving materials
Task 1b: Review of Documentation and Questions for SFWMD	Chairperson and panelists	March 26, 2009
Task 2. Field Excursion and Workshop	Panelists, chairperson and SFWMD team	March 30-April 1, 2009 (3-days)
Task 3: Final Peer Review Report	Chairperson submits report to SFWMD	April 17, 2009

3 Scope of Work

3.1 Duties and Tasks of Panel and Chairperson

During this project, the panelists will complete all tasks listed below.

<u>Duties for Panelists</u>

1. Review and evaluate the technical documentation (e.g., explanation of methods and approach used, tools, data sources, and assumptions)

2. Review all scientific or technical data, methodologies, and models used.

3. Review all scientific and technical analyses. Identify strengths and weaknesses of the analyses.

4. Review and evaluate materials provided to the panel during the course of the peer review process. All materials (excluding reference/background materials) provided up to the final peer review workshop shall be included in the evaluation by the panel.

5. Actively participate in the technical workshop.

6. Respond to the SFWMD questions of the peer panel in ATTACHMENT D.

7. Contribute to the final peer review report.

In addition to the panelist duties described above, the chairperson shall also perform the following duties:

1. Submit a draft workshop agenda. SFWMD will be taking minutes during each day of the workshop.

2. Assign tasks to panelists for completion of various sections the draft peer review report and ensure that they fully understand the requirements for each task.

3. Organize materials from other panelists and submit a draft peer review report and final peer review report. Each panelist shall read and review the materials provided independently, and then the panelists shall collaborate with the chairperson to develop the peer review report during the public workshop and through the web board. The chairperson shall coordinate all the activities and products of the panel. The chairperson shall be the editor of the peer review report and shall compile and reconcile the contributions from the other panelists.

4. Panel concurrence on each topic is recommended but not required. In the event that differences of opinion cannot be reconciled by the chairperson, then they may be reported as such or as minority opinions.

4 Work Breakdown Structure

4.1 Tasks for Panel

4.1.1 Task 1. Receipt of Materials

The technical documentation will be delivered to the panel by March 20th, 2009. The panelists shall acknowledge that they have read the statement of work and agree to the terms therein along with receipt of the following:

1. Documentation entitled, “Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes.”

2. Reference materials contained that accompany the draft technical document.

The panelist shall mail (electronic or post office) a signed and dated acknowledgment form (ATTACHMENT B) to the SFWMD once receiving a copy of the technical documentation.
The panelists shall read the statement of work and begin review of the project technical report and supporting reference materials that accompany the draft technical document. The reference materials are provided so the panelists may become familiar with tools, data, or other information that was synthesized in the technical document. The reference material is provided only as informative reference material; it is not under review and is not necessary that it be reviewed. Some of the reference material will be provided in the form of links to PDF files on the SFWMD’s web site, or ftp site, or links to other web sites.

Deliverable 1a: Acknowledge receipt of materials by emailing the SFWMD peer review facilitator

Due Date: 48 hours after receiving materials. A signed form (ATTACHMENT B) should be mailed to the SFWMD peer review facilitator.

4.1.2 Task 1: Questions for SFWMD

The panelists shall provide questions to be considered by the SFWMD team in preparation for the workshop using the classification listed in Table 2. The panelists will develop specific and general questions regarding items in the project technical report and post them on the web board 5 days prior to the public workshop (March 26, 2009).

Table 2: Format for Questions

Major issues for discussion	
Minor issues requiring further clarification	
Typos and editorial comments in documentation	To be provided on electronic copy of documentation
Major strengths	

The panel shall review the project technical report in regards to its approach and review the documentation itself. The panel shall provide comments and recommendations on, but not limited to, the following:

- Format and clarity of the documentation in explanation of technical approach, data sources and assumptions, overall structure, and readability of text, tables, and figures.
- Suitability of analyses for its intended application.
- Capabilities, limitations, and future improvements.
- In areas where the panel identifies deficiencies, specific recommendations to resolve the deficiencies are required to facilitate revision of the documentation.

It is recognized that each member of the panel shall comment most substantively on areas within their primary expertise, but comments are welcome on other appropriate aspects of the technical document. In addition to comments and recommendations, the peer review report shall include responses to the topic questions. The responses by the panel shall be stated in the most unambiguous manner possible. The peer review report shall address the questions that accompany the draft technical document.

<u>Deliverable 1b</u>: A list of initial questions and concerns from each panelist will be posted on the web board 5 days prior to the workshop. For the chairperson only – a categorized list of the single set of outstanding questions from the panel that require written response from the SFWMD team at the last day of the workshop. This list would contain questions that were not fully addressed at the workshop and needed to finalize the peer review report.

<u>Due Date</u>: April 1, 2009 the last day of the peer review workshop

4.1.3 Task 2: Peer Review Field Excursion and Workshop

The peer review workshop will last 2 days after the 1-day field trip. All portions of the 2-day workshop are open to the public. The field excursion will provide a driving and aerial tour of the project areas and is not a public forum. Therefore the panelists shall not discuss the project with each other aside from the public workshop. The workshop shall be held for panelists to discuss their individual findings in their reviews and to work together to reach a consensus on all sections of the peer review report. Up to a one half day portion of the workshop shall be dedicated to incorporating the SFWMD team's responses to the panel questions. The panel shall also consider other comments and clarifications made by the SFWMD team. Time will be allocated for public comments. The final part of the workshop will include an executive panel session. During this time, the chairperson will compile a list of any outstanding questions needed to complete the peer review report and give these questions to the SFWMD team prior to the conclusion of the workshop. At the conclusion of the workshop, a draft peer review report should be nearly completed. The chairperson is responsible for coordinating and delivering the final peer review report. The field excursion will be held prior to public workshops, and will consist of a helicopter flight and van tour of the Kissimmee River Floodplain and adjacent areas. All participating panelists will be required to sign a liability waiver (ATTACHMENT C). Panelists need to plan to be in Osceola County, Florida for a total of three 8-hour working days. The final peer review report is due two weeks after the peer review workshop (April 17, 2009).

The agenda for the workshop will be developed through consultation between the SFWMD and the chairperson. The SFWMD shall post a draft agenda on the web board one week prior to the start of the workshop. Final comments to the agenda shall be posted to the web board no later than two business days prior to the start of the workshop. The agenda will include, at a minimum, the following items:

1. SFWMD presentation including introductions, a brief overview, and meeting logistics

2. Question-and-answer session between the panel and SFWMD team.

3. Review of schedule and logistics for the final peer review report.

4. SFWMD responses to panel questions.

5. Public comment.

6. An executive work session for the panel to discuss and reach consensus on the peer review report. During this time the chairperson should compile a list of any outstanding questions needed to complete the peer review report and give to the SFWMD team prior to the end of the executive work session.

The peer review workshop will be conducted between the hours 8:30AM–5:00PM with up to a one-hour break for lunch each day. Lunch is not provided during the workshop.

Deliverable 2: Panelists will make their own travel arrangements to Orlando, Florida and actively participate in the workshop and field excursion. "Active participation" is defined as adhering to ground rules established by the workshop facilitator and the Florida Sunshine Law, attending all presentations, letting presenters know when any part of the presentation is not understood, be familiar with the SFWMD expectations for the peer review, and be ready to work within the schedule and through the logistics for the peer review. Personal appearance at the workshop is required. No panelist shall be allowed to attend via teleconference.

Due Date: The workshop will be March 31-April 1, 2009.

4.1.4 Task 3: Develop Peer Review Report

The peer review report is the final deliverable of this statement of work. The panel shall work collaboratively during the public workshop and through the web board to produce a report appropriate for a broad audience that includes scientists, stakeholders, and other interested parties. The chairperson shall seek consensus among the panelists. Each panelist is responsible for cooperating with the chairperson in the development of the peer review report.

The chairperson shall be the editor of this report and shall coordinate all the activities of the panel to this end. Panelists shall provide their products to the chairperson in a timely fashion closely following the review schedule provided in this statement of work. Panelists shall be contributors to the peer review report.

The peer review report shall include an executive summary, which includes the panel's recommendations. The SFWMD team's responses to these recommendations shall be included in the peer review report as part of the executive summary. The peer review report shall include responses to topic questions that accompany the draft technical document. The questions posed by the panel in Task 2, at the workshop and from the web board will be answered by the SFWMD team in a question/answer format. All questions will be answered in writing on the web board. The peer review report shall include

minutes taken by the SFWMD from the public workshops as an appendix. The peer review report shall also summarize the key points made during the workshop. A video or audio tape of the meeting will also be made for SFWMD records.
The peer review report will at a minimum include the following sections (section names can be modified):

1. Executive Summary
2. Introduction
3. Panel responses to the questions that will accompany the draft technical document
4. Overall Findings and Recommendations

The peer review report shall use a Microsoft Word template for styles and formatting. Questions regarding the use of the template will be addressed by the peer review coordinators. The peer review report shall display line numbers for each page and display page numbers.

Deliverable 3: Completion and submission of a final report. The report shall be written in Microsoft Word and posted to the web board and emailed to the peer review facilitator.

Due Date: Chairperson shall post on the web-board the final report on or prior to April 17, 2009.

4.2 Duties and Tasks of SFWMD

The technical documentation and internet addresses to background materials will be provided to each panelist by SFWMD staff. SFWMD will perform the following duties, with the responsible person in parenthesis (see Section 8):

1. Prepare the technical documents to be distributed to the panel (technical lead)
2. Post background materials to panelists and provide the project technical report (peer review coordinators)
3. Finalize workshop agenda (peer review coordinators)
4. Handle logistics for the field trip and workshop (peer review coordinators)
5. Take minutes of the workshops and post on web board(peer review coordinators)
6. Respond to panelists' questions and comments at the workshop (technical lead)
7. Establish and monitor web board (peer review coordinators)

8. Review and approve all deliverables associated with this scope of work (all).

9. Staff will provide support to the panel during the workshop. The chairperson should inform SFWMD personnel what technical assistance they anticipate needing prior to the workshop.

10. The SFWMD will electronically record all workshop meetings (peer review coordinators).

The SFWMD agrees to perform its duties within the timeframes of this statement of work.

5 Evaluation Criteria for Acceptance of Deliverables

Task 1a Criteria for the acceptance of the Task 1a deliverable is acknowledgment of receipt of review materials and signing off on scope of work.

Task 1b Criteria for the acceptance of the Task 1b deliverable is the compilation of questions prior to March 20, 2009. The panel's questions, concerns, and information to the SFWMD should reflect thoughtful reading of the documents provided.

Task 2 Criteria for the acceptance of the Task 2 deliverable is active participation in the peer review workshop held March 30-April 1, 2009 (3 days) in Orlando, Florida.

Task 3 Criteria for the acceptance of the Task 3 deliverable will be the submittal of the final peer review report, representing a consensus view of the entire panel. The report shall include all of the sections outlined in this statement of work. The report shall summarize the key points made during the peer review workshop and include constructive steps to be taken to correct any deficiencies identified by the panel. The final peer review report shall respond to all the questions that accompany the draft technical document and to additional questions or issues raised in the workshop. It will also reflect a thoughtful and substantive evaluation of the technical document. The report should be objective in its evaluation and written so that it can be understood by a broad audience.

6 Payment for Services

A summery of deliverables and schedule by task associated with this project are set forth below in Table 3. Each panelist must provide a cost for each item in Table 3. Panelists are responsible for making and paying for their own travel and meal arrangements. Based on the hourly unit rate, the total task cost for each task in Table 3 should be completed. The unit rate shall include the costs incurred for travel, meals, phone calls, overhead, etc. All deliverables submitted hereunder are subject to review and approval by the SFWMD. Upon satisfactory completion of all services required, the panelists will be paid at the specified hourly unit rate that includes all labor and expenses.

The chairperson hereby agrees to provide the SFWMD all deliverables described in the statement of work in Microsoft Word format. Acceptability of all work will be based on the judgment of the SFWMD that the work is technically defensible, accurate, precise, and timely.

After issuance of the purchase orders, payment will be made following receipt and acceptance by the SFWMD of project deliverables in accordance with the schedule set forth below, and after receipt of an invoice. Payment by the SFWMD for all work completed herein will not exceed the TOTAL in the table below. The Panelist should submit invoices to the peer review coordinators for approval upon completion of all the indicated tasks in Table 3.

Table 3: Schedule of Deliverables and Rate Schedule

Task Number	Deliverables	Due Date	Estimated Hours	Unit cost	Task Cost	Payment
Task 1a	Acknowledgement of Materials	48 hours after receiving materials				
Task 1b	Review of Documentation and Questions for SFWMD	Post questions on SFWMD web-board by Thursday, February 26, 2009	24			
Task 2	Participation in Workshop and Field excursion in Kissimmee, FL	Monday, March 2, 2009 through Wednesday, March 4, 2009 (3 days)	24			
Task 3	Complete Peer Review Report	Friday, March 20, 2009	12			
		TOTAL	**60**			

7 Definitions

Key terms have been defined to aid in the readability of this statement of work. These terms are as follows:

Chairperson	Panelist who leads the peer review process and prepares the final report
SFWMD	South Florida Water Management District
SFWMD District HQ	Headquarters of the South Florida Water Management District: 3301 Gun Club Road, West Palm Beach, FL 33406
Email Addresses	Addresses to be used by chairperson to submit panel products to the SFWMD.
Mailing Address	Water Supply Department, Mail Code 4350, South Florida Water Management District, P.O. Box 24680, West Palm Beach, FL, 33416-4680
SFWMD Team	A team of scientists and planners from the SFWMD
Panel	The peer review panel, a group of six experts (five panelists and one chairperson) assembled to peer review the project technical report
Panelist	A member of the peer review panel
Peer Review Coordinator	Responsible for the development, oversight and implementation of this statement of work. Activities

	include being the point of contact for inquiries and mailings, scheduling and tracking of completed tasks, booking of meeting rooms and field trips, setting up and maintenance of the web board, procurement, and all other logistical considerations.
Project Technical Lead	Responsible for the completion of the project technical report and all support materials to be reviewed by the panel, the selection of the panel questions, concurrence of the panel and chairperson, and overseeing all technical elements of the peer review.
Reference Materials	This includes a set of important supporting reference documents that will accompany the draft technical document.
Peer Review Report	Peer review documentation prepared by the panel to be submitted to the SFWMD as the final product of the peer review.
Project Technical Report	Technical report summarizing the project for the panel, to be prepared by the project technical lead.
SFWMD	South Florida Water Management District
Web Board	An internet site implemented by the SFWMD and accessible to the public at: Kissimmee River section of the Natural System Technical Document Peer Review Web Board: http://webboard.sfwmd.gov/default.asp?boardid=NSTDPR&action=0 This site will be used as repository for all draft/final chapters and versions of peer review report and agendas for the workshop and teleconference. Under Florida's Sunshine Law, it is mandatory that all communications between two or more panelists occur in a forum open to the public. However no discussions, between panelists, can occur on the web board prior to the workshop to insure an independent review. Data may be posted and read by members of the board, SFWMD staff as well as the public. Anyone experiencing difficulty in accessing the web board should contact the web board administrator. Discussions on posted items shall occur during teleconferences and workshop.
Web Board Administrator	The peer review facilitator will assist anyone with difficulties posting or reading web board messages.
Workshop	A public meeting of the panel to be held in Osceola County, Florida. Personal attendance of panel members is required. Presentations will be given by

the SFWMD to answer questions from the panel and the public. The panel shall discuss and work on peer review and tasks for peer review reports.

ATTACHMENT A
Sunshine Rules

General links:
http://myfloridalegal.com/pages.nsf/main/b2f05db987e9d14c85256cc7000b28f6!OpenDocument
https://my.sfwmd.gov/portal/page?_pageid=2934,19738785,2934_19738944&_dad=portal&_schema=PORTAL

Statute link:
http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=Ch0286/SEC011.HTM&Title=-%3e2007-%3eCh0286-%3eSection%20011

ATTACHMENT B

Task 1
Acknowledgement – Receipt of Draft Documentation and Background Materials

1. I have read the statement of work and I will complete my assigned tasks.

2. I received the draft documentation and background materials on ______________
Date

______________________________ ____________________________________
Name Signed

Please mail to:
Jason Godin
Senior Environmental Scientist
SFWMD
Water Supply Department
Mail Code 4350
West Palm Beach, FL 33416-4680

ATTACHMENT C

Liability Waiver

WHEREAS, ________________________________(“PARTICIPANT”) has
[Print full name]
voluntarily requested, from the South Florida Water Management District (“DISTRICT”), to participate in ____
___________________________ on or about _____________ which may involve the use
(Types of activities) (Date)
of DISTRICT transportation (automobiles, airboats, aircraft, and other transportation) and other equipment, as well as use of canals, property, and surrounding rights of way owned and operated by the DISTRICT; and

WHEREAS, DISTRICT is willing to allow use of its transportation, equipment, canals, property, and surrounding rights of way to facilitate the above identified activities upon the representations and conditions that PARTICIPANT agrees to abide by all safety procedures, agrees to obey all directions and demands of DISTRICT personnel, if any, and PARTICIPANT specifically acknowledges and assumes any and all risks associated with the above identified activities;

NOW THEREFORE, in consideration of the premises set forth above, I hereby release and agree to indemnify and hold harmless the District (including, but not limited to its Governing Board members, employees, agents, attorneys, legal representatives, and their successors and assigns) from all liability, personal injuries, claims, damages, attorneys fees, costs, judgments, claims bills, etc. (under the laws of the State of Florida, and of any other state of the United States of America and/or of the United States of America) arising, in whole or in part, from the acts, omissions, or negligence of the District or any third person that arises out of or is related to the above referenced use of District transportation, equipment, canals, right of ways, personal property and real property.

_________________________________	_____________________
PARTICIPANT’S SIGNATURE	DATE
____	_____________________
PRINT PARTICIPANT’S NAME	WITNESS SIGNATURE
____	_____________________
PRINT PARTICIPANT’S ADDRESS PHONE	PRINT PARTICIPANT’S
____	
PRINT PARTICIPANT’S CITY & ZIP	

ATTACHMENT D

Kissimmee Basin Water Reservations Peer Review Panel Technical Questions

Questions on Fish and Wildlife Indicators and Hydrologic Linkages for Each Reservation Waterbody

1. Do the environmental indicators selected provide the basis for protecting fish and wildlife in terms of ensuring sustainable native communities through natural cycles of drought, flood, and population variation?

2. Are there any major environmental indicators not considered in our analyses that could significantly affect the quantity, timing, and distribution of water identified for the protection of fish and wildlife?

3. Do the performance measures A) adequately represent the hydrologic requirements of fish and wildlife identified for protection and B) do the 'range of acceptability' values proposed provide equivalent levels of protection of fish and wildlife?

Questions on Analyses Including Modeling

4. Are the hydrologic methodologies, models, analyses and assumptions sufficiently supported by available scientific knowledge, research and data?

5. Do the hydrologic methodologies, models, analyses and assumptions described in the report yield sufficiently accurate results to reasonably support their applications as described in the report?

6. Can/Should the margin of error associated with the estimation of flow and stage as defined in this report be combined with the range of acceptability associated with the biologic performance measures, for the purpose of describing to policy makers, boundries within which they are equally sure (or unsure) that the desired protection of fish and wildlife will be achieved.

Questions on Water Reservation Criteria

7. Are the methodologies used to develop the Target Time Series for the river and for the lakes scientifically and technically valid, given the constraints of the initial reservation?

8. Is the water identified for the protection of fish and wildlife technically supported for each of the eight reservation water bodies?

9. What additional work, if any, should be considered to enhance the technical criteria for future updates of these water reservations?

Question on the Overall Technical Document

10. Does the compiled information, including data, analyses, assumptions, and literature review, provide a reasonable basis for the conclusions reached about the water needed to protect fish and wildlife for each of the eight reservation water bodies?

APPENDIX B

RESTORATION EXPECTATIONS FOR THE KISSIMMEE RIVER RESTORATION PROJECT

This document is available as a pdf on the Web Board.

APPENDIX F: ADDITIONAL FLORAL AND FAUNAL COMMUNITIES IN THE KISSIMMEE RIVER AND FLOODPLAIN

PLANT COMMUNITIES

A major component of fish and wildlife habitat is vegetation. Floodplain wetlands are crucial breeding and foraging areas for fish and wildlife (Scheaffer and Nickum 1986, Gladden and Smock 1990). Plants provide food (both directly and indirectly as habitat for prey species); nesting substrate and materials; and shelter for juvenile and adult fish, birds, invertebrates, reptiles, and amphibians. Use of the Kissimmee River and its floodplain by animals is strongly linked to hydrology via vegetation. Floodplain vegetation can serve as a surrogate for the relationships between hydrology and fish and wildlife. For these reasons, and because of its prominence in the fish and wildlife discussions that follow, major classes of floodplain vegetation and their hydrologic requirements are presented first in this appendix.

General categories of Kissimmee River floodplain vegetation are described in the Kissimmee River Vegetation Classification (Bousquin and Carnal 2005). Of primary interest are the Wet Prairie, Broadleaf Marsh, and Wetland Shrub groups. These three wetland types historically (pre-channelization) accounted for more than 80% of the total floodplain habitat. Contribution by wetland group included Broadleaf Marsh at 52%, Wet Prairie at 29%, and Wetland Shrub at 1% (Spencer and Bousquin 2014). Other vegetation groups include Wetland Forest, Miscellaneous Wetlands, and Aquatic Vegetation, which are presented in more detail in Carnal and Bousquin (2005) and Bousquin and Carnal (2005).

This appendix focuses on the three dominant vegetation groups because of their prominence on the floodplain, utility as indicators of floodplain hydrologic conditions, importance to fish and wildlife in the Kissimmee River and floodplain, and the use of the Broadleaf Marsh and Wet Prairie groups as performance measures in the Kissimmee River Restoration Evaluation Program.

Broadleaf Marsh Group

The Broadleaf Marsh group is similar to numerous vegetation types described elsewhere in literature under different regional names (**Table F-1**). The Broadleaf Marsh group in the Kissimmee River floodplain is dominated by one or two indicator species, pickerelweed (*Pontederia cordata*) and/or bulltongue arrowhead (*Sagittaria lancifolia*). Prominent associated species may include the shrub buttonbush (*Cephalanthus occidentalis*) and the grass maidencane (*Panicum hemitomon*). Under normal hydrologic conditions, this community occur in standing water for much of the year. This typically results in a low complement of understory species, which may include cutgrass (*Leersia hexandra*), cupscale (*Sacciolepis striata*), alligatorweed (*Alternanthera philoxeroides*), spatterdock (*Nuphar lutea*), smartweed (*Polygonum punctatum*), bacopa (*Bacopa caroliniana*), dollarweed (*Hydrocotyle umbellata*), and the invasive shrub primrose willow (*Ludwigia peruviana*).

The Broadleaf Marsh group requires extended periods of inundation, with estimates ranging from 190 to 270 days per year (**Table F-1**, **Figure F-1**). In a study of the Kissimmee River Demonstration Project, Toth (1991) estimated broadleaf marsh hydroperiods to range from 210 to 270 days per year. Kushlan (1990) estimated depth requirements of similar marshes ranging from 0.3 to 1.0 meters (m). Wetzel (2001) estimated 0.2 to 0.4 m as the minimum depth for optimal growth rates for numerous marsh types, including several types of wet prairie. Seasonal or periodic water level reduction is also important in these communities (Kushlan 1990, United States National Vegetation Classification System 2008) to avoid exceeding the upper tolerance of the dominant species, which can uproot and die (Kushlan 1990). In general, floodplain marshes may require fires at least once per decade to inhibit woody plant invasion

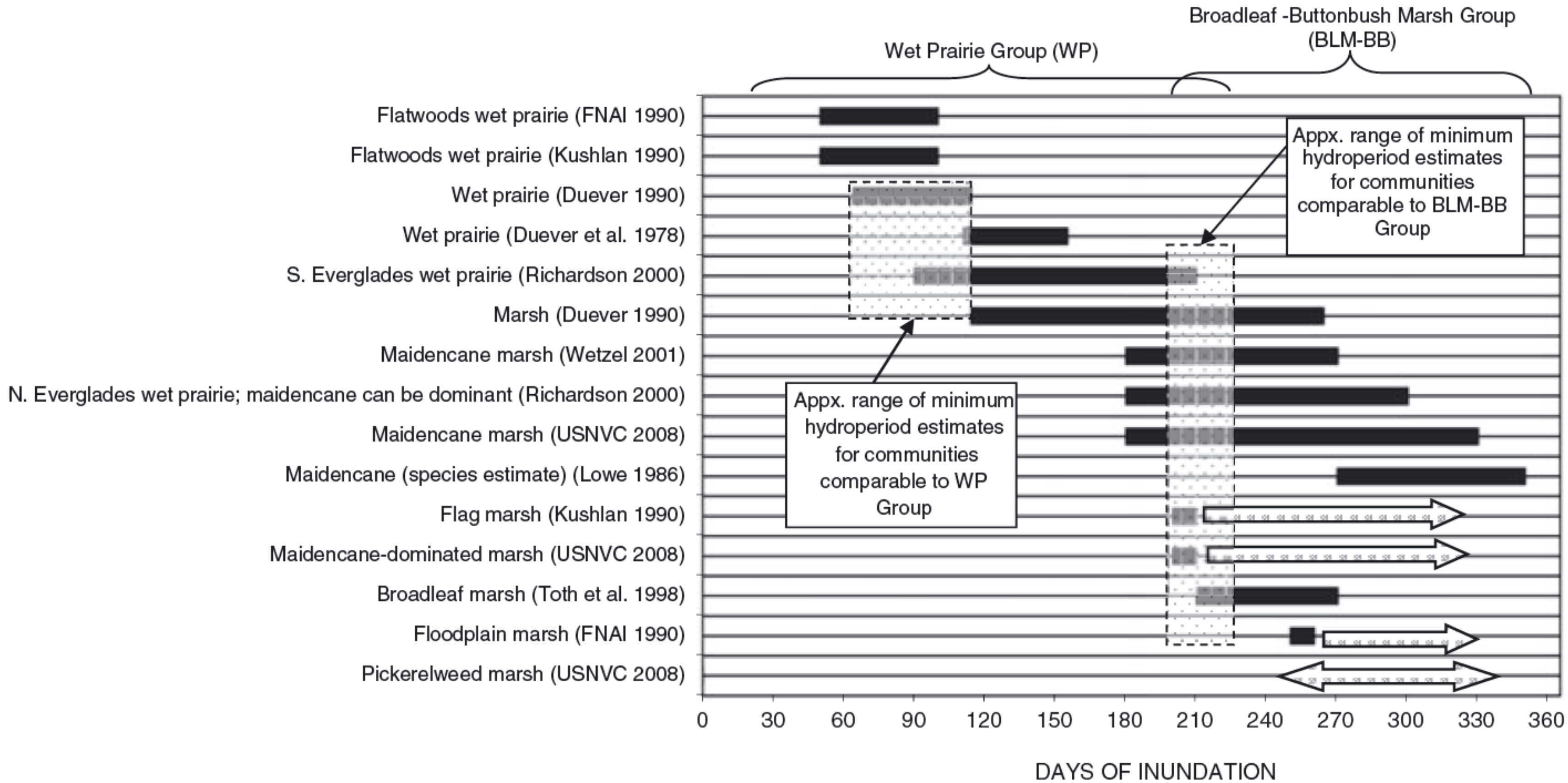
(Duever 1990, Florida Natural Areas Inventory 1990, Kushlan 1990). However, the role of fire on the pre-channelization floodplain has been disputed (Toth et al. 1995).

In the pre-channelization system, communities in the Broadleaf Marsh group occurred in a broad swath that dominated the central floodplain where hydroperiods were longest and water was deepest (**Figure F-2**). Broadleaf marsh communities in 1954 (pre-channelization) accounted for approximately 52% of floodplain vegetation within the Kissimmee River Restoration Project (KRRP) Phase I construction area (most of Pool C and a portion of Pool B) (Spencer and Bousquin 2014). A few years after completion of the C-38 Canal in 1971, the Broadleaf Marsh group coverage declined to only 3.1% of the vegetation in the Phase I area. Although coverage of the Broadleaf Marsh group increased over the next 25 years to 15% in 1996, it occurred mostly in impounded wetlands (Spencer and Bousquin 2014) and its coverage remained much lower than the pre-channelized condition. This decline of long hydroperiod floodplain vegetation coincided with reductions in fish and wildlife populations over the same periods, as described elsewhere in this appendix and in Toth (1993) and Bousquin et al. (2005). The most recent KRRP Phase I floodplain vegetation map at this writing was completed in 2011, 10 years after completion of restoration construction and implementation of an interim water regulation schedule. While sporadic inundation re-established various kinds of wetland vegetation over much of the floodplain, the Broadleaf Marsh group accounted for only 21% of the Phase I area (L. Spencer, South Florida Water Management District [SFWMD], unpublished data), with most of its former distribution occupied by communities in the Wet Prairie group. Thus, while intermittent inundation has been achieved since completion of Phase I, annual durations of inundation have proved inadequate for recovery of the Broadleaf Marsh group. Expansion to its former floodplain distribution is expected when extended hydroperiods are re-established under the Headwaters Revitalization Water Regulation Schedule (United States Army Corps of Engineers 1996), currently projected for implementation in 2020.

Table F-1. Duration and depth of inundation for wetland plant communities similar to the Broadleaf Marsh and Wet Prairie groups on the Kissimmee River.

Community	Source Nomenclature	Dominant Species	Source	Duration (days)	Depth
Pickerelweed marsh	Pickerelweed Tropical Herbaceous Vegetation, Unique ID CEGL004261	Pickerelweed	USNVC (2008)	Most of year, with little variation in hydroperiod	
Floodplain marsh	Floodplain marsh, river marsh	Maidencane, buttonbush, and sawgrass; other typical plants include arrowheads and pickerelweed	FNAI (1990)	>250	
Broadleaf marsh	Broadleaf marsh	Pickerelweed and arrowhead	Toth et al. (1998)	210 to 270	
Maidencane-dominated marsh	Maidencane – Pickerelweed Herbaceous Vegetation, Unique ID CEGL004461 (Maidencane is dominant)	Maidencane	USNVC (2008)	>200	0.3-1 m
Flag marsh	Flag marshes	Includes marshes dominated by maidencane, pickerelweed, arrowhead, bulrush, beakrush, and spikerush	Kushlan (1990)	>200	0.3-1 m
Maidencane (species estimate)	Species estimate	Maidencane	Lowe (1986, Figure 5)	270 to 350	
Maidencane marsh	Maidencane Tropical Herbaceous Vegetation, Unique ID CEGL003980	Maidencane	USNVC (2008)	180 to 330	
Northern Everglades wet prairie; maidencane can be dominant	Wet prairie (northern Everglades)	Maidencane, spikerush, or beakrush	Richardson (2000)	180 to 300	Standing water
Maidencane marsh	Maidencane marsh	Maidencane	Wetzel (2001) citing Schomer and Drew (1982, page 117)	180 to 270	
Marsh	Marsh	Not specified	Duever (1990), Figure 2	114 to 264	
Southern Everglades wet prairie	Wet prairie (southern Everglades)	Not specified	Richardson (2000) citing Davis (1943)	90 to 210	Less than sloughs but deeper than sawgrass
Wet prairie	Wet prairie	Not specified	Duever et al. (1978) (wet prairie)	111 to 155	
Wet prairie	Wet prairie	Not specified	Duever (1990, Figure 2)	64 to 114	
Flatwoods wet prairie	Wet prairie (flatwoods)	Grasses, sedges, and forbs, including maidencane, cordgrass, beakrush, and muhly	Kushlan (1990)	50 to 100	
Flatwoods wet prairie	Wet prairie (flatwoods)	Grasses and herbs, including maidencane, spikerush, and beakrush	FNAI (1990)	50 to 100	

FNAI = Florida Natural Areas Inventory; m = meter; USNVC = United States National Vegetation Classification System.


Broadleaf -Buttonbush Marsh Group (BLM-BB)
Wet Prairie Group (WP)
Flatwoods wet prairie (FNAI 1990)
Flatwoods wet prairie (Kushlan 1990)
Wet prairie (Duever 1990)
Wet prairie (Duever et al. 1978)
S. Everglades wet prairie (Richardson 2000)
Marsh (Duever 1990)
Maidencane marsh (Wetzel 2001)
N. Everglades wet prairie; maidencane can be dominant (Richardson 2000)
Maidencane marsh (USNVC 2008)
Maidencane (species estimate) (Lowe 1986)
Flag marsh (Kushlan 1990)
Maidencane-dominated marsh (USNVC 2008)
Broadleaf marsh (Toth et al. 1998)
Floodplain marsh (FNAI 1990)
Pickerelweed marsh (USNVC 2008)
Appx. range of minimum hydroperiod estimates for communities comparable to BLM-BB Group
Appx. range of minimum hydroperiod estimates for communities comparable to WP Group
0 30 60 90 120 150 180 210 240 270 300 330 360
DAYS OF INUNDATION

4477

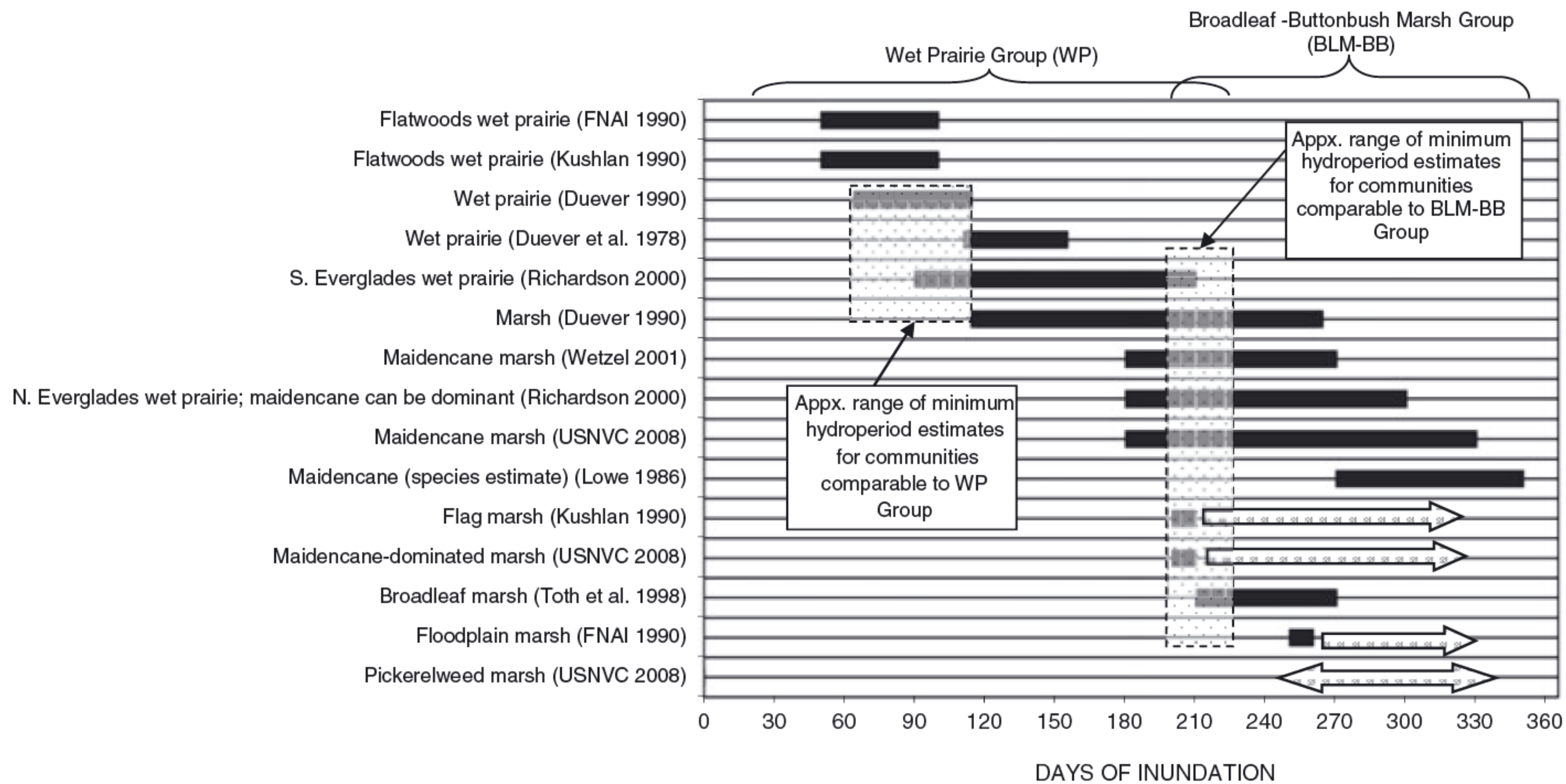


Figure F-1. Published estimates of Florida marsh plant community inundation durations.

*Gray arrows indicate estimates for which only a minimum inundation duration was described or no numerical estimate was provided (e.g., the duration given for pickerelweed marsh was "most of year with little variation in hydroperiod" in United States National Vegetation Classification System [USNVC 2008]). See **Table F-1** for additional details. Note: FNAI = Florida Natural Areas Inventory.*

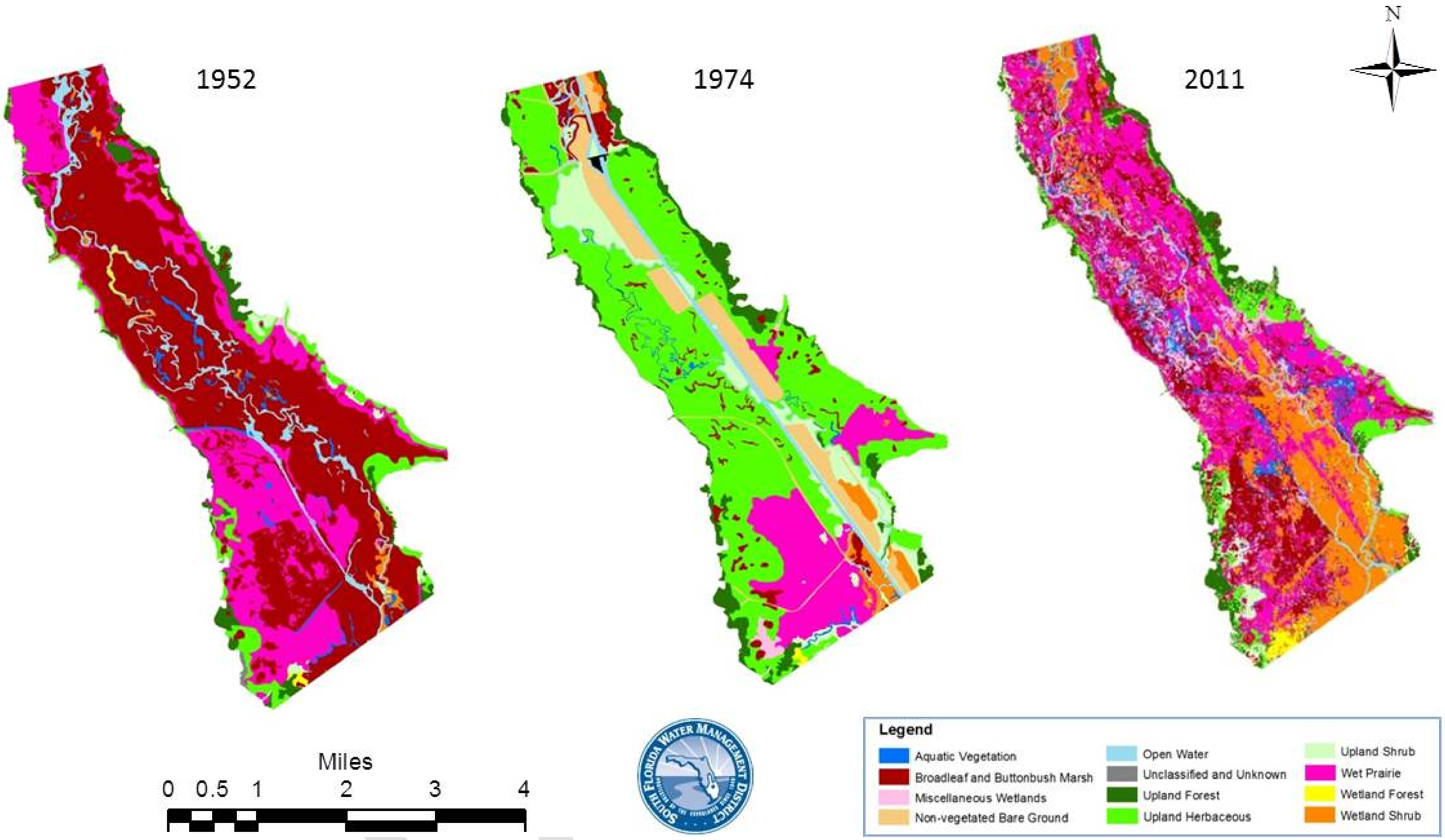


Figure F-2. Floodplain vegetation in the Phase I area of the Kissimmee River Restoration Project before channelization (left), 3 years after channelization was completed in 1971 (center), and 10 years after re-establishment of flow (right).

The Phase I construction area includes most of Pool C and portions of Pool B where flow and partial floodplain inundation were re-established in 2001. Red, pink, purple, and orange coloring denotes major wetland classes. Bright and light greens are upland classes. (Based on data from: Milleson et al. 1980, Pierce et al. 1982, Spencer and Bousquin 2014).

Wet Prairie Group

Communities included in the Wet Prairie group are variable in species composition. The group includes several herbaceous, emergent plant communities that have shorter hydroperiod requirements than the Broadleaf Marsh group. Almost all emergent marsh communities not classified as in the Broadleaf Marsh group are in the Wet Prairie group.

The Wet Prairie group comprises communities dominated by grasses and sedges, including maidencane, beakrushes (*Rhynchospora* spp.), soft rush (*Juncus effusus*), bushy broomgrass (*Andropogon glomeratus*), flatsedges (*Cyperus* spp.), spikerushes (*Eleocharis* spp.), Virginia iris (*Iris virginica*), cutgrass (*Leersia hexandra*), and watergrass (*Luziola fluitans*), as well as a few associations dominated by forbs, such as dotted smartweed (*Polygonum punctatum*). Additional details on the composition of Wet Prairie group community types can be found in the appendices to Bousquin and Carnal (2005).

The term "wet prairie" is used to classify a variety of emergent marsh communities occurring across a range of hydrologic situations (**Figure F-1**). The term often describes herbaceous graminoid-dominated communities in areas between longer hydroperiod wetlands and surrounding uplands, or in wet inclusions within uplands. Literature estimates of inundation duration for vegetation comparable in species composition to the Wet Prairie group range from 60 to 180 days per year (**Table F-1**, **Figure F-1**). The Wet Prairie group requires periodic drying (Goodrick and Milleson 1984, Barbour and Billings 2000) for germination and growth of seedlings. Wet Prairie group communities are believed to be adapted to fire and may depend on periodic burning to inhibit invasion by shrubs (Wade et al. 1980).

On the Kissimmee River floodplain, Wet Prairie group communities occur between the upper elevations of the Broadleaf Marsh group and surrounding uplands. Before channelization, Wet Prairie group communities occurred in an irregular, relatively narrow strip around much of the floodplain's periphery, and in depressions at higher elevations covering approximately 29% of the floodplain (**Figure F-2**) (Pierce et al. 1982, Spencer and Bousquin 2014). Following completion of the C-38 Canal in 1971, much of the Wet Prairie group distribution rapidly converted to various upland herbaceous communities and declined to 15% coverage (**Figure F-2**). Where these communities were used as pasture, shrub invasion was inhibited by grazing or mechanical maintenance; in less accessible places, large areas of upland shrub stands developed. By 1996, where conditions remained intermittently wet following channelization, the Wet Prairie and Wetland Shrub groups occupied areas that had been in the Broadleaf Marsh group, but at similar coverage (13%) as in 1971. Where backfilling was completed in 2001 for KRRP Phase I, a rapid conversion to wetland vegetation occurred by 2003, increasing Wet Prairie group coverage to 33%, with equivalent coverage (30%) being maintained to 2011 (**Figure F-2**). Much of this coverage is expected to convert to the Broadleaf Marsh group following completion of the project in 2020 following implementation of the Headwaters Revitalization Water Regulation Schedule (United States Army Corps of Engineers 1996) and re-establishment of longer floodplain hydroperiods.

Wetland Shrub Group

Several communities dominated by the following wetland-dependent shrub taxa fall into the Wetland Shrub group: buttonbush (*Cephalanthus occidentalis*), Carolina willow (*Salix caroliniana*), primrose willow (*Ludwigia peruviana* and/or *L. leptocarpa*), and St. John's wort (*Hypericum fasciculatum*). The last two species are not major components of the Kissimmee River floodplain.

Buttonbush is a native component of the Broadleaf Marsh group that comprises understories indistinguishable from the Broadleaf Marsh group but is classified as shrub stands due to areal cover of buttonbush that exceeds 30%. Therefore, hydrologic requirements of buttonbush communities are within the same range as the Broadleaf Marsh group. Carolina willow communities occur along abandoned channel

oxbows and other slight rises in elevation on the floodplain, sometimes over large areas, and are an important source of cover and nesting substrate for wading birds (M. Cheek, SFWMD, personal observation) as in the southern Everglades (Frederick and Spalding 1994). Primrose willow, an exotic and invasive shrub, often occurs as an undesirable but persistent element of the Broadleaf Marsh group, particularly under the deep, stabilized water regimes that occur at water control structures in the lower regions of pools in the channelized condition. Primrose willow may brown and drop leaves when plants are flooded to approximately 50% to 70% of their height (B. Anderson and S. Bousquin, SFWMD, personal observation), but may rapidly re-sprout when water levels recede before death of the plants.

The Wetland Shrub group represented approximately 1% of the KRRP Phase I area floodplain vegetation prior to channelization of the Kissimmee River, remained low (3%) within 3 years of channelization (1974), and increased to 19% by the most recent complete vegetation map (2011, 10 years after completion of KRRP Phase I construction in 2001) (**Figure F-2**). Woody species respond more slowly than herbaceous vegetation; the 2011 increase likely began during the channelized period. Wetland Shrub group distributions may continue to be influenced by the current inability to fully re-establish pre-channelization hydroperiods. This situation is expected to be resolved by the revised water regulation schedule slated for implementation in 2020 (United States Army Corps of Engineers 1996).

FISH

Fish assemblages and hydrologic requirements are described in Chapter 4 of the main document. **Table F-2** provides a species list and life history characteristics.

Table F-2. Species of fish recorded from the Kissimmee River and their guild, spawning season, and mode of spawning.

Common Name	Scientific Name	Guild[1]	Spawning Season	Spawning Mode[2]
Bowfin	*Amia calva*	OS	April to July	N
Redfin pickerel	*Esox americanus*	OS	Spring and fall	SD
Chain pickerel	*Esox niger*	OS	Spring and fall	SD
Yellow bullhead	*Ameiurus natalis*	OS	April to May	N
Brown bullhead	*Ameiurus nebulosus*	OS	May	N
Tadpole madtom	*Noturus gyrinus*	OS	June to July	N
Pirate perch	*Aphredoderus sayanus*	OS	December to May	N/M
Flagfish	*Jordanella floridae*	OS	March to September	N, AVD
Bluefin killifish	*Lucania goodei*	OS	Spring to summer	SA
Mosquitofish	*Gambusia holbrooki*	OS	Late spring to summer	L
Least killifish	*Heterandria formosa*	OS	Most of the year	L
Sailfin molly	*Poecilia latipinna*	OS	Late spring/late summer	L
Everglades pygmy sunfish	*Elassoma evergladei*	OS		AVD
Okefenokee pygmy sunfish	*Elassoma okefenokee*	OS		AVD
Bluespotted sunfish	*Enneacanthus gloriosus*	OS	April to September	N
Longnose gar	*Lepisosteus osseus*	OD – R	March to September	SV
Florida gar	*Lepisosteus platyrhincus*	OD – R	April to October	SV
Gizzard shad	*Dorosoma cepedianum*	OD – R	April to June	SD
Threadfin shad	*Dorasoma petenense*	OD – L	May to July	SD

Common Name	Scientific Name	Guild[1]	Spawning Season	Spawning Mode[2]
Common carp – EXOTIC	*Cyprinus carpio*	OD – J	Spring	SF
Grass carp – EXOTIC	*Ctenopharyngodon idella*	OD – R	Spring	SA
Golden shiner	*Notemigonus crysoleucas*	OD – R	April to July	SD
Taillight shiner	*Notropis maculatus*	OD – L	March to August	SD
Coastal shiner	*Notropis petersoni*	OD – R, L, J	March to October	SD
Pugnose minnow	*Opsopoedus emiliae*	OD – J	March to September	SD
Lake chubsucker	*Erimyzon sucetta*	OD – J	May to July	SD
White catfish	*Ameiurus catus*	OD – J	April to July	N
Channel catfish	*Ictalurus punctatus*	OD – R	March to June	N
Walking catfish – EXOTIC	*Clarius batrachus*	OD – R	June to November	N
Brown hoplo – EXOTIC	*Hoplosternum littorale*	OD – R	June to November	NF
Seminole killifish	*Fundulus seminolis*	OD – R, L, J	April to summer	SA
Brook silverside	*Labidesthes sicculus*	OD – J	June to August	SA
Redbreast sunfish	*Lepomis auritrus*	OD – L	March to September	N
Warmouth	*Lepomis gulosus*	OD – R, L, J	April to October	N
Bluegill	*Lepomis machrochirus*	OD – R, L, J	February to October	N
Dollar sunfish	*Lepomis marginatus*	OD – R, L, J	April to September	N
Redear sunfish	*Lepomis microlophus*	OD – R, L, J	February to October	N
Spotted sunfish	*Lepomis punctatus*	OD – R, L, J	May to November	N
Largemouth bass	*Micropterus salmoides*	OD – R, L, J	December to May	N
Black crappie	*Pomoxis nigromaculatus*	OD – R, L, J	April to May	N
Oscar – EXOTIC	*Astronotus ocellatus*	OD – R, L, J		N
Blue tilapia – EXOTIC	*Oreochromis aureus*	OD – J		N/M
Golden topminnow	*Fundulus chrysostus*	OD – R	Late spring to summer	SA
Lined topminnow	*Fundulus lineotus*	HG		SA
Redface topminnow	*Fundulus rubifrons*	HG		SA
Tidewater silverside	*Menidia beryllina*	HG	June to August	SD
Swamp darter	*Etheostoma fusiforme*	HG	December to May	AVD
American eel	*Anguilla rostrata*	FS		SF
Atlantic needlefish	*Strongylura marina*	FS	Summer	AVD
Blackbanded darter	*Percina nigrofasciata*	FS		?
Stripped mullet	*Mugil cephalus*	FS		SD
Sailfin catfish – EXOTIC	*Pterygoplichthys disjunctivus*			N

[1] FS = fluvial specialist; HG = habitat generalist; J = juvenile; L = larval; OS = off channel specialist; OD = off channel dependent; R = reproduction. Habitat guild follows Glenn and Arrington (2005).

[2] AVD = demersal eggs attached to vegetation; L = livebearer; constructs floating nest; N = nest builder; N/M = nest builder/mouthbrooder; SA = scatters adhesive eggs; SD = scatters demersal eggs; SF = scatters floating eggs; SV = scatters eggs in vegetation. Spawning modes are from Trexler (1995).

AMPHIBIANS AND REPTILES

Amphibians and reptiles (herpetofauna) are abundant and often conspicuous inhabitants of freshwater broadleaf marshes. Amphibians are of particular ecological interest because of their complex life cycle, which includes an obligate association of larvae with water. As such, adult and larval amphibians, as well as reptiles, are particularly vulnerable to shifts in wetland hydrology (Pechmann et al. 1989).

Before 1960 and channelization of the Kissimmee River, the Broadleaf Marsh group was one of the dominant vegetation communities, covering approximately half of the floodplain within the KRRP area. Although detailed records of amphibian and reptile use of floodplain wetlands adjacent to the Kissimmee River are not available prior to channelization, Carr (1940) lists characteristic and frequently occurring amphibian and reptile taxa of Central Florida freshwater (broadleaf-like) marshes. These taxa likely accounted for most herpetofaunal species inhabiting floodplain marshes along the pre-channelized Kissimmee River.

Channelization of the river and conversion of wetlands to uplands, combined with shortened and unpredictable hydroperiods in remnant wetlands likely altered herpetofaunal communities (Koebel et al. 2005). Of the 24 species that likely occurred in pre-channelization Broadleaf Marsh group wetlands, only 3 were collected in the drained floodplain adjacent to the Kissimmee River (**Table F-3**): the green tree frog (*Hyla cinera*), the southern leopard frog (*Rana sphenocephala*), and the eastern cottonmouth (*Agkistrodon piscivorus*). The taxa that appear most affected are those that require long periods of inundation for reproduction (many anurans) and those that are entirely aquatic (salamanders). This reduction is a strong indicator that degraded Broadleaf Marsh group communities no longer adequately function to support the necessary refuge, foraging, and reproductive needs of amphibians and reptiles of the river-floodplain system.

Restoration of pre-channelization hydrology, including long-term floodplain inundation, is expected to re-establish historical floodplain wetland plant communities (Carnal 2005a,b) within the KRRP area. Hydrologic and wetland habitat restoration will be the impetus for recolonization of amphibians and reptiles characteristic of the pre-channelized Kissimmee River floodplain ecosystem. During extreme rainfall events, events that produce standing water on the unrestored Kissimmee River floodplain, all seven native anuran taxa and several species of reptiles likely to exist in natural wetlands of Central Florida were found in limited numbers on the floodplain (B. Anderson, SFWMD, unpublished data). Recruitment from remnant isolated wetlands and unaltered wetlands adjacent to and upstream of the restored river should contribute to rapid recolonization of the restored floodplain. For example, all 24 taxa likely to colonize restored wetlands (**Table F-3**) have been documented in wetlands of the Avon Park Air Force Range, adjacent to the floodplain (Franz et al. 2000). Other studies have shown that amphibians can colonize and reproduce in restored (Lehtinen and Galatowitsch 2001, Stevens et al. 2002, Petranka et al. 2003, Brodman et al. 2006) and constructed wetlands (Knutson et al. 2004).

Table F-3. Characteristic and frequently occurring aquatic amphibian and reptile taxa of Central Florida freshwater (broadleaf) marshes (From: Carr 1940).

Common Name	Scientific Name	Obligate Association with Water
Amphibians		
Amphiumidae		
Two-toed siren	*Amphiuma means*	A
Plethodontidae		
Dwarf salamander	*Eurycea quadridigitata*	A
Sirenidae		
Greater siren	*Siren lacertina*	A
Hylidae		
Florida chorus frog	*Pseudacris nigrita verrucosa*	L
Florida cricket frog	*Acris gryllus dorsalis*	L
Green tree frog*	*Hyla cinerea*	L
Little grass frog	*Pseudacris ocularis*	L
Squirrel tree frog	*Hyla squirella*	L
Ranidae		
Pig frog	*Rana grylio*	L
Southern leopard frog*	*Rana sphenocephala*	L
Reptiles		
Alligatoridae		
American alligator	*Alligator mississippiensis*	
Chelydridae		
Florida snapping turtle	*Chelydra serpentine osceola*	
Colobridae		
Eastern mud snake	*Farancia abacura*	
Florida green water snake	*Nerodia floridana*	
Florida water snake	*Nerodia fasciata pictiventris*	
South Florida swamp snake	*Seminatrix pygaea*	
Striped crayfish snake	*Regina alleni*	
Emydidae		
Florida chicken turtle	*Deirochelys reticularia*	
Peninsula red-bellied turtle	*Pseudemys nelsoni*	
Peninsular cooter	*Pseudemys floridana*	
Kinosternidae		
Common musk turtle	*Sternotherus odoratus*	
Florida mud turtle	*Kinosternon subrubrum steindachneri*	
Trionychidae		
Florida softshell turtle	*Trionyx ferox*	
Viperidae		
Eastern cottonmouth*	*Agkistrodon piscivorus*	

A = adult; L = larvae.
* Denotes taxa observed in degraded Broadleaf Marsh group (currently pasture) adjacent to the Kissimmee River.

BIRDS

Bird assemblages, hydrologic requirements, and life history characteristics are described in Chapter 4 of the main document and in **Tables F-4** and **F-5**.

Table F-4. Birds of the Kissimmee River floodplain, including seasonality and protective status.

Common Name	Scientific Name	Seasonality[1]	Status[2]
American bittern	*Botaurus lentiginosus*	V	
American coot	*Fulica americana*	R	
American crow	*Corvus brachyrhynchos*	R	
American redstart	*Setophaga ruticilla*	M	
American robin	*Turdus migratorius*	V	
American swallow-tailed kite	*Elanoides forficatus*	R	
American white pelican	*Pelecanus erythrorhynchos*	V	
American wigeon	*Anas americana*	V	
American woodcock	*Scolopax minor*	V	
Anhinga	*Anhinga anhinga*	R	
Bald eagle	*Haliaeetus leucocephalus*	R	
Baltimore oriole	*Icterus galbula*	V	
Barn owl	*Tyto alba*	R	
Barn swallow	*Hirundo rustica*	M	
Barred owl	*Strix varia*	R	
Belted kingfisher	*Megaceryle alcyon*	V	
Black skimmer	*Rynchops niger*	S	ST
Black tern	*Chlidonias niger*	M	
Black vulture	*Coragyps atratus*	R	
Black-bellied whistling duck	*Dendrocygna autumnalis*	R	
Black-crowned night heron	*Nycticorax nycticorax*	R	
Black-necked stilt	*Himantopus mexicanus*	R	
Blue-gray gnatcatcher	*Polioptila caerulea*	R	
Bluejay	*Cyanocitta cristata*	R	
Blue-winged teal	*Anas discors*	V	
Blue-winged warbler	*Vermivora pinus*	M	
Boat-tailed grackle	*Quiscalus major*	R	
Bobolink	*Dolichonyx oryzivorus*	M	
Bonapart's gull	*Chroicocephalus philadelphia*	S	
Brewer's blackbird	*Euphagus cyanocephalus*	S	
Brown pelican	*Pelecanus occidentalis*	S	
Brown thrasher	*Toxostoma rufum*	R	
Brown-headed cowbird	*Molothrus ater*	R	
Carolina wren	*Thryothorus ludovicianus*	R	
Caspian tern	*Hydroprogne caspia*	S	
Cattle egret	*Bubulcus ibis*	R	
Chimney swift	*Chaetura pelagica*	R	
Chuck-will's widow	*Caprimulgus carolinensis*	R	
Common grackle	*Quiscalus quiscula*	R	
Common ground dove	*Columbina passerina*	R	
Common moorhen	*Gallinula chloropus*	R	
Common nighthawk	*Chordeiles minor*	R	
Common yellowthroat	*Geothlypis trichas*	R	
Cooper's hawk	*Accipiter cooperii*	R	
Crested caracara	*Caracara cheriway*	R	FT
Double-crested cormorant	*Phalacrocorax auritus*	R	
Downy woodpecker	*Picoides pubescens*	R	
Eastern bluebird	*Sialia sialis*	R	
Eastern kingbird	*Tyrannus tyrannus*	R	
Eastern meadowlark	*Sturnella magna*	R	

Common Name	Scientific Name	Seasonality[1]	Status[2]
Eastern phoebe	*Sayornis phoebe*	V	
Eastern screech owl	*Megascops asio*	R	
Eastern towhee	*Pipilo erythrophthalmus*	R	
Eastern wood-peewee	*Contopus virens*	M	
Fish crow	*Corvus ossifragus*	R	
Florida burrowing owl	*Athene cunicularia floridana*	R	ST
Florida grasshopper sparrow	*Ammodramus savannarum floridanus*	R	FE
Florida sandhill crane	*Grus canadensis pratensis*	R	ST
Forster's tern	*Sterna forsteri*	V	
Fulvous whistling duck	*Dendrocygna bicolor*	R	
Glossy ibis	*Plegadis falcinellus*	R	
Golden-crowned kinglet	*Regulus satrapa*	S	
Gray catbird	*Dumetella carolinensis*	R	
Great blue heron	*Ardea herodias*	R	
Great egret	*Ardea alba*	R	
Great-crested flycatcher	*Myiarchus crinitus*	R	
Greater yellowlegs	*Tringa melanoleuca*	V	
Great horned owl	*Bubo virginianus*	R	
Green heron	*Butorides virescens*	R	
Green-winged teal	*Anas crecca*	V	
Gull-billed tern	*Gelochelidon nilotica*	S	
Hermit thrush	*Catharus guttatus*	V	
Herring gull	*Larus argentatus*	V	
Hooded merganser	*Lophodytes cucullatus*	V	
House wren	*Troglodytes aedon*	V	
Killdeer	*Charadrius vociferus*	R	
King rail	*Rallus elegans*	R	
Least bittern	*Ixobrychus exilis*	R	
Least sandpiper	*Calidris minutilla*	V	
Least tern	*Sternula antillarum*	S	ST
Lesser scaup	*Aythya affinis*	V	
Lesser yellowlegs	*Tringa flavipes*	V	
Limpkin	*Aramus guarauna*	R	
Lincoln's sparrow	*Melospiza lincolnii*	S	
Little blue heron	*Egretta caerulea*	R	ST
Loggerhead shrike	*Lanius ludovicianus*	R	
Long-billed dowitcher	*Limnodromus scolopaceus*	V	
Mallard	*Anas platyrhynchos*	R	
Marsh wren	*Cistothorus palustris*	V	
Merlin	*Falco columbarius*	V	
Mottled duck	*Anas fulvigula*	R	
Mourning dove	*Zenaida macroura*	R	
Northern bobwhite	*Colinus virginianus*	R	
Northern cardinal	*Cardinalis cardinalis*	R	
Northern flicker	*Colaptes auratus*	R	
Northern harrier	*Circus cyaneus*	V	
Northern mockingbird	*Mimus polyglottos*	R	
Northern parula	*Parula americana*	R	
Northern pintail	*Anas acuta*	V	
Northern rough-winged swallow	*Stelgidopteryx serripennis*	R	
Northern shoveler	*Anas clypeata*	V	
Northern waterthrush	*Seiurus noveboracensis*	M	
Osprey	*Pandion haliaetus*	R	
Ovenbird	*Seiurus aurocapilla*	V	
Painted bunting	*Passerina ciris*	V	
Palm warbler	*Dendroica palmarum*	V	
Peregrine falcon	*Falco peregrinus*	V	
Pied-billed grebe	*Podilymbus podiceps*	R	

Common Name	Scientific Name	Seasonality[1]	Status[2]
Pileated woodpecker	*Dryocopus pileatus*	R	
Pine warbler	*Dendroica pinus*	R	
Prairie warbler	*Dendroica discolor*	V	
Purple gallinule	*Porphyrio martinica*	R	
Purple martin	*Progne subis*	R	
Red-bellied woodpecker	*Melanerpes carolinus*	R	
Red-headed woodpecker	*Melanerpes erythrocephalus*	R	
Red-shouldered hawk	*Buteo lineatus*	R	
Red-tailed hawk	*Buteo jamaicensis*	R	
Red-winged blackbird	*Agelaius phoeniceus*	R	
Ring-necked duck	*Aythya collaris*	V	
Roseate spoonbill	*Platalea ajaja*	R	ST
Ruby-crowned kinglet	*Regulus calendula*	V	
Ruby-throated hummingbird	*Archilochus colubris*	R	
Ruddy duck	*Oxyura jamaicensis*	V	
Savannah sparrow	*Passerculus sandwichensis*	V	
Sedge wren	*Cistothorus platensis*	V	
Sharp-shinned hawk	*Accipiter striatus*	V	
Short-billed dowitcher	*Limnodromus griseus*	V	
Short-tailed hawk	*Buteo brachyurus*	R	
Snail kite	*Rostrhamus sociabilis*	R	FE
Snowy egret	*Egretta thula*	R	
Solitary sandpiper	*Tringa solitaria*	M	
Song sparrow	*Melospiza melodia*	V	
Sora	*Porzana carolina*	V	
Southeast American kestrel	*Falco sparverius paulus*	R, V	ST
Spotted sandpiper	*Actitis macularius*	V	
Summer tanager	*Piranga rubra*	R	
Swamp sparrow	*Melospiza georgiana*	V	
Tree swallow	*Tachycineta bicolor*	V	
Tricolored heron	*Egretta tricolor*	R	ST
Turkey vulture	*Cathartes aura*	R	
Vesper sparrow	*Pooecetes gramineus*	V	
Whip-poor-will	*Caprimulgus vociferus*	V	
White ibis	*Eudocimus albus*	R	
White-eyed vireo	*Vireo griseus*	R	
White-tailed kite	*Elanus leucurus*	S	
White-throated sparrow	*Zonotrichia albicollis*	V	
White-winged dove	*Zenaida asiatica*	R	
Wild turkey	*Meleagris gallopavo*	R	
Wilson's snipe	*Gallinago delicata*	V	
Wood duck	*Aix sponsa*	R	
Wood stork	*Mycteria americana*	R	FT
Yellow warbler	*Dendroica petechia*	M	
Yellow-bellied sapsucker	*Sphyrapicus varius*	V	
Yellow-billed cuckoo	*Coccyzus americanus*	R	
Yellow-breasted chat	*Icteria virens*	M	
Yellow-crowned night heron	*Nyctanassa violacea*	R	
Yellow-headed blackbird	*Xanthocephalus xanthocephalus*	S	
Yellow-rumped warbler	*Dendroica coronata*	V	
Yellow-throated warbler	*Dendroica dominica*	R	

[1] M = transient migrant (non-breeding); R = breeding resident; S = uncommon straggler (non-breeding); V = seasonal visitor (non-breeding).
[2] FT = threatened (federal), and FE = endangered (federal); ST = threatened (state). From: Florida Fish and Wildlife Conservation Commission. *Florida's Endangered and Threatened Species*. Updated December 2018.

Table F-5. Foraging and breeding habitat hydrologic requirements of wetland-obligate bird species of the Kissimmee River floodplain, including preferred foraging and breeding habitats.

Common Name	Scientific Name	Foraging Habitat Type	Foraging Hydrologic Requirements	Breeding Habitat Type	Breeding Hydrologic Requirements (Water Depth)
Ducks, Geese, and Swans (Anseriformes, Anatidae)					
American wigeon	*Anas americana*	All	0 to 20 cm	--	--
Black-bellied whistling duck	*Dendrocygna autumnalis*	All, OW	0 to ≤6.6 cm	WF (BLM, WS, WP)	Near water
Blue-winged teal	*Anas discors*	BLM, WP	13 to 88 cm (mean 30 cm)	--	--
Fulvous whistling-duck	*Dendrocygna bicolor*	All, OW	<0.5 m	BLM, WS, WP	<0.5 m
Green-winged teal	*Anas crecca*	All	0 to 25 cm (mean <12 cm)	--	--
Hooded merganser	*Lophodytes cucullatus*	All and OW	<1.5 m	--	--
Lesser scaup	*Aythya affinis*	OW, BLM	<3 m	--	--
Mallard	*Anas platyrhynchos*	All, OW	0-39 (mean 31 to 39 cm)	--	--
Mottled duck	*Anas fulvigula*	BLM, WP, WS, OW	<30 cm	WS, WP (obligatory nester near wetlands)	Within 15 to 219 m of water (mean 119 m)
Northern pintail	*Anas acuta*	BLM, WP, OW	0 to 30 cm	--	--
Northern shoveler	*Anas clypeata*	OW, BLM, WP	<40 cm	--	--
Ring-necked duck	*Aythya collaris*	All, OW	<1.5 m	--	--
Ruddy duck	*Oxyura jamaicensis*	OW, BLM, WP	1 to 3 m	--	--
Wood duck	*Aix sponsa*	WF, WS	18 to 40 cm (up to 1 m)	WF	Over or near water; <2 km from water maximum
Grebes (Podicipediformes, Podicipedidae)					
Pied-billed grebe	*Podilymbus podiceps*	All, OW	<6 m	BLM, WP, WS	>25 cm
Pelicans (Pelecaniformes, Pelecanidae)					
American white pelican	*Pelecanus erythrorhynchos*	BLM, WP	0.3 to 2.5 m	--	--
Brown pelican	*Pelecanus occidentalis*	BLM, WP, OW	Permanently flooded <150 m	--	--
Cormorants (Phalacrocoracidae)					
Double-crested cormorant	*Phalacrocorax auritus*	WS, WF, OW	<8 m	WF, WS	<10 km from water
Darters (Anhingidae)					
Anhinga	*Anhinga anhinga*	WS, WF, OW	<0.5 m	WF, WS	1 to 4.6 m above water

Common Name	Scientific Name	Foraging Habitat Type	Foraging Hydrologic Requirements	Breeding Habitat Type	Breeding Hydrologic Requirements (Water Depth)
Herons, Bitterns, and Allies (Ciconiiformes, Ardeidae)					
American bittern	*Botaurus lentiginosus*	BLM, WP	Mean 10 cm	--	--
Black-crowned night heron	*Nycticorax nycticorax*	All, OW	<20 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Great blue heron	*Ardea herodias*	All, OW	<40 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Great egret	*Ardea alba*	All, OW	<28 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Green heron	*Butorides virescens*	All, OW	<10 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Least bittern	*Ixobrychus exilis*	BLM, WS, WP	1 to 60 cm; usually at surface	BLM, WS, WP	Over water >0.5 m March to August; recession <18.3 cm/week
Little blue heron	*Egretta caerulea*	All, OW	<17 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Snowy egret	*Egretta thula*	All, OW	<17 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Tricolored heron	*Egretta tricolor*	All, OW	<18 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Yellow-crowned night heron	*Nyctanassa violacea*	All, OW	<10 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Ibises and Spoonbills (Threskiornithidae)					
Glossy ibis	*Plegadis falcinellus*	All, OW	<10 cm	All	Over water >0.5 m March to August; recession <18.3 cm/week
Roseate spoonbill	*Platalea ajaja*	All, OW	<20 cm (mean ≤12 cm)	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
White ibis	*Eudocimus albus*	All, OW	<20 cm (mean 5 to 10 cm)	WF, WS (BLM, WP)	Over water >0.5 m March to August; recession <18.3 cm/week
Storks (Ciconiidae)					
Wood stork	*Mycteria americana*	All, OW	<50 cm	WF, WS	Over water >0.5 m March to August; recession <18.3 cm/week
Hawks, Kites, Eagles, and Allies (Falconiformes, Accipitridae)					
Bald eagle	*Haliaeetus leucocephalus*	BLM, WP, OW	0 to 2 m	WF (<2 km water)	<2 km from open water
Osprey	*Pandion haliaetus*	All, OW	0.5 to 2 m	WF (obligatory nester near water)	<1 to 20 km from open water
Snail kite	*Rostrhamus sociabilis*	BLM, WP, WS, OW	0.2 to 1.3 m	WS, WF	36 to 93 cm

Common Name	Scientific Name	Foraging Habitat Type	Foraging Hydrologic Requirements	Breeding Habitat Type	Breeding Hydrologic Requirements (Water Depth)
Rails, Gallinules, and Coots (Gruiformes, Rallidae)					
American coot	*Fulica americana*	All, OW	<6 m	All	Over permanent water <1.2 m from open water
Common moorhen	*Gallinula chloropus*	All, OW	15 to 120 cm	WS, BLM, WP	0 to 60 cm
King rail	*Rallus elegans*	BLM, WS, WP	<10 cm	BLM, WS, WP	10 to 46 cm
Purple gallinule	*Porphyrio martinica*	All, OW	0.25 to 1 m	BLM, WF, WS	14.7 cm (6 to 26 cm)
Sora	*Porzana carolina*	BLM, WP, WS	<15 cm (0 to 46 cm)	--	--
Limpkins (Aramidae)					
Limpkin	*Aramus guarauna*	BLM, WS, WF, OW	<30 cm	All	61.2 cm (41 to 122 cm)
Cranes (Gruidae)					
Florida sandhill crane	*Grus canadensis pratensis*	BLM, WEP	0 to 30 cm	BLM, WEP, WS	13.5 to 32.6 cm
Stilts and Avocets (Charadriiformes, Recurvirostridae)					
Black-necked stilt	*Himantopus mexicanus*	BLM, WS, WP, OW	<13 cm	BLM, WP	Usually over water or <50 m from open water
Sandpipers and Allies (Scolopacidae)					
Greater yellowlegs	*Tringa melanoleuca*	BLM, WP, OW	5 to 7.4 cm	--	--
Least sandpiper	*Calidris minutilla*	BLM, WP, WS, OW	<4 cm	--	--
Lesser yellowlegs	*Tringa flavipes*	BLM, WP, WS, OW	2.6 cm (4 to 16 cm)	--	--
Long-billed dowitcher	*Limnodromus scolopaceus*	BLM, WS, WP, OW	0 to 16 cm	--	--
Short-billed dowitcher	*Limnodromus griseus*	BLM, WS, WP, OW	<8 cm	--	--
Solitary sandpiper	*Tringa solitaria*	BLM, WP, WS, OW	<5 cm	--	--
Spotted sandpiper	*Actitis macularius*	BLM, WP, OW	<4 cm	--	--
Wilson's snipe	*Gallinago delicata*	All	<8 cm	--	--
Skuas, Gulls, Terns, and Skimmers (Laridae)					
Black skimmer	*Rynchops niger*	BLM, WP, OW	<2.5 to 20 cm	--	--
Black tern	*Chlidonias niger*	BLM, WP, OW	>0.5 m	--	--
Bonapart's gull	*Chroicocephalus philadelphia*	BLM, WP, OW	>0.5 m	--	--
Caspian tern	*Hydroprogne caspia*	BLM, WP, OW	0.5 to 5 m	--	--
Forster's tern	*Sterna forsteri*	OW, BLM, WP	<1 m	--	--
Gull-billed tern	*Gelochelidon nilotica*	BLM, WP, OW	0 to 5 m	--	--
Herring gull	*Larus argentatus*	WP, BLM, OW	<1-2 m	--	--
Least tern	*Sternula antillarum*	BLM, WP, WS, OW	0 to 5 m	--	--

Common Name	Scientific Name	Foraging Habitat Type	Foraging Hydrologic Requirements	Breeding Habitat Type	Breeding Hydrologic Requirements (Water Depth)
Kingfishers (Coraciiformes, Alcedinidae)					
Belted kingfisher	*Megaceryle alcyon*	All, OW	<60 cm	--	--
Swallows (Passeriformes, Hirundinidae)					
Tree swallow	*Tachycineta bicolor*	All	Any	--	--
Wrens (Troglodytidae)					
Marsh wren	*Cistothorus palustris*	WS, WF, WP, BLM	<1 m	--	--
Emberezids (Emberizidae)					
Swamp sparrow	*Melospiza georgiana*	All	<4 cm	--	--
Blackbirds (Icteridae)					
Boat-tailed grackle	*Quiscalus major*	All, OW	<8 cm	WF, WS (BLM, WP) (obligatory nester near water)	93.1 cm
Red-winged blackbird	*Agelaius phoeniceus*	All	<1 m	WS, BLM, WP	<1 m

All = all habitats, except open water; BLM = Broadleaf Marsh; OW = Open Water; WF = Wet Forest; WP = Wet Prairie; WS = Wet Shrub.
-- Breeding range occurs outside of the Kissimmee River floodplain.
Foraging and breeding habitat information and hydrologic requirements were obtained from point count surveys along the river and from Willard (1977), Powell (1987), Stys (1997), Guillemain et al. (2000), Poole (2008), and Florida Fish and Wildlife Conservation Commission (2003).

MAMMALS

Currently, 26 species of mammals use the Kissimmee River and floodplain, including 4 resident breeders and 2 federally listed species, the Florida panther (*Puma concolor coryi*) and the Florida bonneted bat (*Eumops floridanus*) (**Table F-6**). Although mammals are not monitored as part of the Kissimmee River Restoration Evaluation Program, populations likely were negatively impacted by losses of wetland habitat and alteration of hydrology caused by channelization.

Mammals using the Kissimmee River and floodplain include 4 obligate wetland species (**Table F-7**), 18 facultative breeders, and 4 opportunistic foragers. Brief summaries of the aquatic life history requirements of several species of mammals are described below. Foraging and breeding habitat hydrologic requirements of wetland-dependent species are summarized in **Table F-7**.

The marsh rabbit (*Sylvilagus palustris*), marsh rice rat (*Oryzomys palustris*), and round-tailed muskrat (*Neofiber alleni*) depend on dense emergent aquatic vegetation for cover and to construct their houses and/or nests near water (Birkenholz 1972, Chapman and Willner 1981, Wolfe 1982). The largely vegetarian diet of all three species comprises the roots, stems, leaves, and seeds of herbaceous wetland plants occurring in Broadleaf Marsh and Wet Prairie group habitats.

River otters (*Lontra canadensis*) nest in hollow trees or logs, undercut riverbanks, backwater sloughs, flood debris, or burrows excavated by other animals, such as the gray fox (*Uroncyon cinereoargenteus*) (Lariviere and Walton 1998). They depend entirely on aquatic habitats for their main prey, including fish, amphibians, crayfish (*Procambarus* spp.), and other aquatic invertebrates.

The 22 facultative and opportunistic wetland mammals include 2 federally endangered species, the Florida panther and the Florida bonneted bat (Florida Fish and Wildlife Conservation Commission 2018). The Florida panther has been documented on several occasions within the 100-year floodline. The Florida bonneted bat was observed foraging over the Kissimmee River floodplain in Pool A, well outside of its reported range south and west of Lake Okeechobee (Belwood 1992, Marks and Marks 2008). However, these species are considered opportunistic users of the Kissimmee River floodplain.

Table F-6. Mammals of the Kissimmee River and floodplain.

Common Name	Scientific Name
Armadillo	*Dasypus novemcinctus*
Bobcat	*Lynx rufus*
Brazilian freetailed bat	*Tadarida b. cynocephala*
Coyote	*Canis latrans*
Eastern cottontail	*Sylvilagus floridanus*
Eastern gray squirrel	*Sciurus carolinensis*
Eastern mole	*Scalopus aquaticus*
Eastern pipistrel bat	*Pipistrellus subflavus*
Eastern woodrat	*Neotoma floridana*
Evening bat	*Nycticeius humeralis*
Feral hog	*Sus scrofa*
Florida black bear	*Ursus americanus floridanus*
Florida bonneted bat*	*Eumops floridanus*
Florida panther*	*Puma concolor coryi*
Gray fox	*Uroncyon cinereoargenteus*
Marsh rabbit	*Sylvilagus palustris*
Marsh rice rat	*Oryzomys palustris*
Northern yellow bat	*Lasiurus i. floridanus*
Opossum	*Didelphis marsupialis*
Raccoon	*Procyon lotor*
River otter	*Lontra Canadensis*
Round-tailed muskrat	*Neofiber alleni*
Seminole bat	*Lasiurus seminolus*
Sherman's fox squirrel	*Sciurus niger shermani*
Striped skunk	*Mephitis mephitis*
Whitetail deer	*Odocoileus virginianus*

* Endangered (federal).

Table F-7. Status and hydrologic requirements of foraging and breeding wetland-obligate mammals of the Kissimmee River.

Common Name	Scientific Name	Status	Foraging Habitat Type	Foraging Hydrologic Requirements	Breeding Habitat Type	Breeding Hydrologic Requirements
Carnivora, Mustelidae						
River otter	*Lutra canadensis*	R	All, OW	0-10 m near permanent water	All (burrows, hollows)	Adjacent to permanent water
Rodentia, Cricetidae						
Marsh rice rat	*Oryzomys palustris*	R	BLM, WP, WS	<1 m	BLM, WP, WS	>30 cm above high water
Round-tailed muskrat	*Neofiber alleni*	R	BLM, WP, WS	15-46 cm	BLM, WP, WS	15-46 cm
Lagomorpha, Leporidae						
Marsh rabbit	*Sylvilagus palustris*	R	All	<1 m	All	Adjacent to water

BLM = Broadleaf Marsh; OW = Open Water; R = breeding resident; WP = Wet Prairie; WS = Wet Shrub.
Foraging and breeding habitat hydrologic requirements obtained from Birkenholz (1972), Chapman and Willner (1981), Wolfe (1982), and Lariviere and Walton (1998).

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APPENDIX G: SUMMARY OF PUBLIC COMMENTS, QUESTIONS, AND DISTRICT RESPONSES ON WATER RESERVATIONS

This appendix provides a summary of comments and questions received from the public during and after public rule development Workshop #3 (April 17, 2020) and Workshop #4 (June 09, 2020). The agendas for these workshops are provided below. Responses given by the South Florida Water Management District (SFWMD) to the comments and questions received at and following the workshops are also provided here. Written comment letters also received after the workshops are provided in **Appendix H**.

The primary objective of the workshops was to receive and respond to comments and questions from the public on any aspect of the water reservation rule development, including April and May 2020 draft rule language and Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes. The technical document contains all of the science, data, methodologies, analyses, and the scientific and technical assumptions employed in each analysis upon which the water reservations are based. All verbal and written comments, questions and District responses given during and after Workshops #3 and #4 were reviewed by SFWMD, and where appropriate, they were addressed in subsequent drafts of the technical document and rules.

Rule Development Workshop for Kissimmee Water Reservations

April 17, 2020 – 10:00 A.M.

Web-Based Workshop Agenda

1. Welcome
2. Water Reservation Process
3. Recap from Past Rule Development Efforts
4. Kissimmee River Restoration Project and Underpinnings for Water Reservation
   a. Headwater Lakes and Kissimmee River
   b. Upper Chain of Lakes
   c. 5 Percent Threshold at S-65
5. Overview of Technical Document
6. Changes to Draft Water Reservation Rule and Permitting Criteria
   a. 40E-10
   b. Applicant's Handbook
7. UK-OPS Modeling and Evaluation Tool
8. Public Comments (1 Hour)
9. Next Steps

THIS WORKSHOP IS OPEN TO THE PUBLIC. COMMENTS ON THE DRAFT RULE LANGUAGE AND TECHNICAL DOCUMENT TO SUPPORT THE RULE ARE REQUESTED TO BE SUBMITTED BY MONDAY, MAY 18, 2020 TO: Toni Edwards, Senior Scientist, Coastal Ecosystems Section, South Florida Water Management District, P.O. Box 24680, West Palm Beach, FL 33406; tedwards@sfwmd.gov or submit comments directly to the Rule Development Forum of the SFWMD web conferencing board available at: http://sfwmd.websitetoolbox.com/

Rule Development Workshop for Kissimmee Water Reservations

June 9, 2020 – 10:00 A.M.

Web-Based Workshop Agenda

1. **Welcome**
2. **Water Reservation Process**
3. **Recap from Past Rule Development Efforts**
4. **Summary of Public Comments Received**
5. **Changes to the Draft Technical Document and Rules**
6. **Public Comments**
7. **Next Steps**

This workshop is open to the public. In response to COVID-19, the workshop will only be held via the Zoom application. Pre-registration is required at https://zoom.us/webinar/register/WN_sMc8mFhdQbWBbBY85ZpNzQ. The draft rule language, Technical Document to support the rule, and other pertinent documents are available at https://www.sfwmd.gov/our-work/water-reservations on the ***Kissimmee*** tab. **COMMENTS ARE REQUESTED TO BE SUBMITTED BY TUESDAY, JUNE 23, 2020** to Toni Edwards at tedwards@sfwmd.gov. Phone: (800) 432-2045, ext. 6387 or (561) 682-6387.

Comment No.	Commenter	Question/Comment	District Response
Q&A During and Following Workshop #3 (April 17, 2020):			
1	Diane Perry	Who is responsible for the management of consumptive use permits?	The Water Use Bureau of the Regulation Division of SFWMD.
2	Brian Megic	Could the District please discuss how the reservation rule upon adoption will be applied to existing permits for water from the Kissimmee Basin system and to existing permits upon timely permit renewal?	Existing water use permits and timely renewals with no increases in allocations and other specific criteria do not withdraw reserved water. They will not have to perform the additional analysis described in the rule.
3	Anonymous	Are the Public's rights of continued and continuous access to traditional uses "Grandfathered"?	Existing users with a Consumptive Use Permit (CUP) (subject to certain provisions) or users that are exempt by statute do not withdraw reserved water. They will not have to perform the additional analysis described in the rule. Non-consumptive uses, e.g., boating, navigation are not the subject of this rule.
4	Anonymous	Public's abilities to access and utilize traditional, non consumptive activities on these reservations have not been mentioned.	Traditional uses are exempt. Traditional, non-consumptive uses will not be affected by these water reservations.
5	Diane Perry	Why is not included in this presentation?	Addressed in Nick Vitani's Workshop #3 presentation.
6	John Capece	Have any of the other reservations had a similar wildlife purpose and how have they performed?	All five of our previously adopted water reservations were adopted for the protection of fish and wildlife. Each of these reservations have different performance measures since they are of different types (reservoir, estuaries, wetlands, etc.). More information on their performance can be obtained by contacting Don Medellin at dmedelli@sfwmd.gov.
7	Jerry Smith	Does groundwater reservation allocation impact aquifer storage and recovery wells?	The District is proposing to reserve water from the surficial aquifer that contributes to the reservation waterbodies. ASRs are generally in deeper aquifers, such as the Floridan aquifer. The Floridan aquifer is not subject to this proposed water reservation rule.
8	Diane Perry	Are the wetland levels tied to water use?	Water use has the potential to affect wetland levels which is evaluated during the water use permit application process. On January 31, 2020, the District held a workshop on the water use permitting program. The video of the workshop is available online at https://www.sfwmd.gov/news-events/meetings.
9	Diane Perry	What action are you authorized to protect water?	We are authorized to adopt water reservations, minimum flows and minimum water levels (MFLs), and restricted allocation areas.
10	Anonymous	Do you mean literally downstream on the river or downstream in the usage?	Downstream existing users, toward the south in the basin.
11	Joan Bausch	Can you briefly explain Lake O constraints?	Addressed further into the Workshop #3 presentation.
12	Diane Perry	Are minimum water levels set by Fish & Wildlife?	SFWMD sets minimum flows and levels within its jurisdiction. Additional information will be provided in the section of the Workshop #3 presentation describing the water reservation lines.

Comment No.	Commenter	Question/Comment	District Response
13	Diane Perry	Who manages traditional use?	Unclear what the requester's definition of 'traditional' use is. However, SFWMD's Regulation Division, Water Use Bureau issues permits for the consumptive use of water.
14	Diane Perry	Remnant channels helped clean water, is there something planned to clean this water?	This water reservation process is focused on water quantity to achieve ecologic restoration targets. Water quality issues are handled by other programs run by the District, Florida Department of Environmental Protection, and the Florida Department of Agriculture and Consumer Services.
15	Diane Perry	Would this reduce flow to Lake O....I hope!?	No, it will change the timing.
16	Diane Perry	Who many years will this reconnection take? When will it start?	If the question is about when the Headwaters Revitalization Schedule for the Kissimmee Headwaters Lakes (Lakes Kissimmee, Cypress, and Hatchineha) will be implemented, it is currently projected to be a little more than a year from now. The Headwaters Revitalization Schedule is anticipated to be utilized once the Kissimmee River Restoration project is complete.
17	Diane Perry	What is used to manage water levels?	The Kissimmee Chain of Lakes is part of the Central and Southern Florida Flood Control Project. The District operates these lakes in accordance with the regulation schedules and water control plans that are adopted by the U.S. Army Corps of Engineers (USACE). For the most part, these schedules set the regulation line water levels at which flood control releases must take place to reduce flood risk. The water control plans also contain guidance for managing recessions and ascensions. District and USACE water managers along with guidance input from fish and wildlife agencies, and scientists manage water levels when water level is below the regulation schedule lines.
18	Diane Perry	Does this affect water flowing into Lake O?	When permits are fully allocated there will be at most a 5% reduction in the annual average flow at S-65, which will slightly reduce the flow into Lake Okeechobee. Timing of flows will also be slightly affected. Additional constraints are described in the Workshop #3 presentation. The small changes in timing and volume are not likely to affect USACE Lake O release decisions.
19	Arlene Stewart	So, to be clear, there is no availability for a new consumptive use application?	No new water will be allocation from the Headwaters Revitalization Lakes or the Kissimmee River. Existing permitted uses (those with existing Consumptive Use Permits) and those exempt from permitting by Florida Statute will be allowed to continue withdrawing water from these waterbodies. The rules do allow new water withdrawals when water is available from waterbodies further north in the system.

Comment No.	Commenter	Question/Comment	District Response
20	Wayne Bradbury	What is the target minimum lake level for Lake Kissimmee? Is it 52.5 feet above sea level? Thank you, I wanted low stage.	This is an operations-related question, not a water reservation question. It's not a "target", but the reader may be misinterpreting the lowest elevation of the water regulation line (above which flood control releases are required) as a "minimum" water level. The lowest elevation of the regulation line in the current (Interim) schedule is 49 feet NGVD29. The lowest elevation of the regulation line in the Headwaters Revitalization Schedule will be 52.5 ft NGVD29, which is the current highest elevation of the regulation line in the Interim Schedule. However, the regulation lines do not define the minimum lake level. Lakes are typically operated below their regulation lines for environmental reasons. After the Headwaters Revitalization Schedule is implemented, the schedule will not require water levels to be 49 ft. by May 31 as the Interim schedule does. Actual minimum water levels depend on rainfall, inflows, outflows, and water management for environmental benefits.
21	Arlene Stewart	But none from the Kissimmee River? [In reference to her earlier question "So to be clear, there is no availability for a new consumptive use application?"]	Correct.
22	Diane Perry	How often do you report? Who sets goals?	Water levels are measured by sensors (gauges) that transmit data to SFWMD HQ by telemetry in near real-time. Water levels are recorded and transmitted every 15 minutes in most cases. Other forms of data collect water levels continuously but may not be as readily available. Reported water levels for larger lakes (e.g., Lake Kissimmee) are based on an average of multiple gauges situated throughout the lake). Real-time data is available on the SFWMD website. For this Water Reservation, daily water levels as of 10 a.m. each day will be used as the basis for determining water availability. Not sure what the last question is asking.
23	Diane Perry	How far from water withdrawal point is the consumptive use considered?	The distance from the withdrawal point depends on the volume withdrawn. If the withdrawal is from a well, its water use permitting rules require an impact assessment to determine if the cone of depression at the 0.1-foot contour extends to the water reservation waterbody. If so, the withdrawal is considered an indirect withdrawal and must comply with the water reservation rules.
24	Diane Perry	Permitting criteria...withdrawal use, from the point of withdrawal, how many miles around the point of water removal is considered for effect on environment? How can that be changed?	The distance from the withdrawal point depends on the volume withdrawn. If the withdrawal is from a well, its water use permitting rules require an impact assessment to determine if the cone of depression at the 0.1-foot contour extends to the water reservation waterbody. If so, the withdrawal is considered an indirect withdrawal and must comply with the water reservation rules.

Comment No.	Commenter	Question/Comment	District Response
25	Diane Perry	Is water quality considered?	This water reservation is focused on protecting the quantity of water needed to achieve ecologic restoration targets of the Kissimmee River Restoration project without also adversely impacting the ecology in the Upper Chain of Lakes. Water quality issues are handled by other programs run by the District, Florida Department of Environmental Protection, and the Florida Department of Agriculture and Consumer Services.
26	Diane Perry	Is amount of sediment in water moving through system monitored?	Since sediment is a water quality aspect, it is not monitored as part of the water reservation process.
27	Jerry Smith	How does water quality influence the decision making process of regulation schedules?	The development of regulation schedules is headed by the U.S. Army Corps of Engineers (USACE). The USACE is responsible for designing and implementing regulation schedules for the primary water storage systems in the Central and Southern Florida Project domain (e.g., Upper Kissimmee Chain of Lakes, Lake Okeechobee, and the Water Conservation Areas). To comply with the National Environmental Policy Act, the USACE must consider potential environmental effects the action may have, including on water quality. However, whether water quality is an objective of the federal action (i.e., whether the USACE formulates to meet a specific water quality target) will depend on the specific project and congressional authorizations. Regulation schedule changes are not part of Kissimmee water reservation rulemaking.
28	Khalil Atasi	How are hurricanes taken into consideration in the watershed hydrology, flow, and water balance?	Hurricanes and other events are included in the historical stages used to establish these water reservations.
29	Robert Beltran	Was this Reservation considered in the recent findings of the 2020 CFWI Regional Water Supply Plan? Specially the plan identified a safe yield for the aquifer in the Central Florida Area?	The Rule states that withdrawals from the Floridan aquifer system to not withdraw reserved water.
30	Diane Perry	Is that a flood control number?	Answered live during workshop.
31	Diane Perry	If flooding issue, where is that water directed?	The District operates the Kissimmee River and Chain of Lakes in accordance with the regulation schedules and water control plans developed by the USACE.
32	Diane Perry	How do you change one of the rules?	You may submit public comment. You may do that here or send a separate written comment as described by Mr. Medellin at the end of Workshop #3.
33	Diane Perry	Specifically, the 0.1 ft. edge of water impact area to a larger area?	The 0.1-foot drawdown produced by a pumping well is the criterion for an indirect withdrawal of groundwater from a reservation waterbody.

Comment No.	Commenter	Question/Comment	District Response
34	Susan Gosselin	These presentations are mixing how water is measured. The discharge needed for KRR is based on CFS while water levels are considered for the non-headwater lakes. Please make the connection as all the non-headwater lakes are controlled by structures and what CFS from non-headwater lakes is necessary for KRR.	The question presumes all water reservation criteria should be measured using consistent parameters like flow or stage, but not both. That presumption is incorrect. As explained during the Workshop #3 presentations, the lakes upstream of Lakes Kissimmee, Cypress, and Hatchineha will have water reservation lines represented as water level elevations, below which withdrawals are not allowable. The proposed rules also require applicants to determine whether the proposed withdrawal would reduce the mean annual flow volume at the S-65 structure. An applicant's proposed operating criteria must also include a check whether Lake Okeechobee is making regulatory discharges to the northern estuaries. These checks and analyses relate to both water levels and flow. The District's UK-OPS Model will be used as a permitting tool. It integrates the components of the water reservation rule criteria to enable users and permit reviewers to test proposed water withdrawals.
35	Diane Perry	How far away from 0.1 drawdown is considered?	That depends on the volume of water being withdrawn. The spatial extent of the area of influence (the 0.1 foot contour) is greater for a larger withdrawal than it is for a smaller withdrawal.
36	Diane Perry	How are water bottling companies considered on the drawdown?	Water bottling companies must meet the conditions for permit issuance just like other proposed users, including public water supply utilities, HOAs, golf courses, agriculture, and other water use classes.
37	Ed de la Parte	Since a portion of the KRR Watershed is located within the CFWI and FS 373.0465(2)(d) requires adoption of uniform CUP rules by FDEP within the CFW, will these rules have to be adopted and/or confirmed by FDEP?	The statute only requires FDEP to include existing recovery strategies within the CFWI that were adopted before July 1, 2016. Recovery strategies are associated with minimum flows and levels (MFLs). The FDEP has stated that a water management district within the CFWI may have to adopt rules to address individual waterbody issues.
38	Diane Perry	Where is excess water routed during flood/hurricane?	The District operates the Central & Southern Florida Control Project in accordance with the federal water control manuals/regulation schedules. The District rules being discussed by Mr. Vitani in his Workshop #3 presentation do allow for permitted users to withdraw excess water if they have space available and receive approval from the District.
39	Nicolas Porter	Good morning, I understand that withdrawals from the Floridan aquifer system are not considered a withdrawal of reserved water under the proposed rule. Are potential indirect withdrawals or drawdown in the surficial aquifer system caused by a withdrawal from the Floridan aquifer likewise intended to be excluded from the reservation?	A withdrawal from the Floridan aquifer system does not use reserved water.

Comment No.	Commenter	Question/Comment	District Response
40	Diane Perry	Allocation to who when there is excess water?	Entities with permits from a reservation waterbody will also be allowed to withdraw water from that waterbody when the District, as local sponsor of the Central & Southern Flood Control Project, is making releases and only under specific circumstances.
41	Diane Perry	Is there a year cumulative withdraw with all the 0.5%?	The 5% criterion is an average over a 41-year simulation period (1965-2005 rainfall years).
42	Diane Perry	How can someone be limited or given water daily, is there a valve?	The District issues water use permits that include specific volumes of water that are authorized for withdrawal. The permit will contain conditions requiring the permittee to determine the lake water stage. The District's DBHYDRO database, which is available to the public, lists the water levels and flows for various waterbodies throughout the District. The permittee will be allowed to withdraw water if the stage exceeds the stage listed in the rule. The permittee will then be required to report to the District those volumes it withdrew.
43	Anonymous	What is the rationale for exempting Dispersed Water Management (DWM) projects?	Dispersed water management (DWM) projects are not looking for a permitted water right that needs to be protected by the District. Each DWM has a specific operating plan in its contract that only allows water to be withdrawn when there is excess water in the C&SF system as determined by reference to Structures S-79 and S-80.
44	Anonymous	It may have already been mentioned, but can you define the location area of indirect surficial withdrawals affected by this proposed reservation?	Rather than a distance, it is when a surficial aquifer system well produces 0.1-foot of drawdown at the edge of the reservation waterbody. Distance varies based on withdrawal rate and drawdown produced.
45	Diane Perry	These bodies of water contribute to smaller bodies of unmonitored water bodies. When a permit is issued, is there a way to see the impact of those outlying waters that the monitored bodies contribute to?	If District staff identify a potential concern in an impact assessment submitted during the permit application process, the District would impose monitoring and reporting conditions on the permit.
46	Diane Perry	Is there a way for you to keep more water when too much water is being released through Lake O?	Because of the relatively small size of the Headwaters Revitalization Lakes compared to Lake Okeechobee, environmental releases from the Kissimmee Chain of Lakes (KCOL) have a very small effect on water levels in Lake Okeechobee. Therefore, these releases do not affect decisions by USACE to release water from Lake Okeechobee to the estuaries. Releases from Lake Kissimmee – particularly in wet season - are essential for restoration of the Kissimmee River and improvement of fish and wildlife habitat in the Headwaters Revitalization Lakes. The reductions in flow from the KCOL due to withdrawals pursuant to the water reservation will not meaningfully benefit the estuaries during periods of high discharge.

Comment No.	Commenter	Question/Comment	District Response
47	Diane Perry	Is there a future holding water area available in the Kissimmee during flood/hurricane to avoid Lake O from releasing too much water?	The Lake Okeechobee Watershed Restoration Project is a Comprehensive Everglades Restoration Plan (CERP) project designed to create water storage north of Lake Okeechobee. For more information, please see https://www.sfwmd.gov/our-work/cerp-project-planning/lowrp.
48	Diane Perry	Sounded like Kiss basin would like more water retained, can that help Lake O during hurricane season?	The goal of the water reservations is not to "retain" water, but to ensure the protection of sufficient water for release through S-65 to restore of the Kissimmee River and improve habitat in the Headwaters Revitalization Lakes. Such releases provide continuous flow in the river and seasonal inundation of the Kissimmee River floodplain, as well as fluctuation of water levels for improvement of littoral habitat in the Headwaters Revitalization Lakes. In addition, releases are used to moderate stage recession or ascension rates and provide flood control in the Headwaters Revitalization Lakes. These environmental releases do not have meaningful effects on water levels in Lake Okeechobee and therefore are not a factor in whether USACE increases flow from Lake Okeechobee to the estuaries during periods of high flow.
49	Arlene Stewart	I think perhaps we wonder what happens if the user is out of tolerance.	We have a Water Use Compliance Section that monitors and enforces permit compliance.
50	Marty Mann	Large lake fluctuations as much as 10 feet have occurred on the Kissimmee Chain of Lakes (KCOL) in the historical past. Due to development and agriculture practices within the floodplain of the KCOL, lake levels have been stabilized for over 50 years. Although this effort has been successful for flood control purposes, it has been detrimental to littoral zone habitat for various fish and wildlife communities with the KCOL. Unfortunately, extreme highs are no longer feasible, but extreme lows have been achieved through managed drawdowns. These extreme low events have served as mitigation to restore lake habitat. In the future, how does the SFWMD plan on integrating extreme lake drawdowns within the water reservation rules on any and all lakes within the KCOL? Thanks for the opportunity to ask this very important question.	The proposed reservation rules will not affect the management of the lakes themselves and will not prevent lake drawdowns. These restoration activities will continue the same as in the past with an interagency approval process. The Applicant's Handbook has a provision which allows the surface water to be withdrawn when water is being released for environmental purposes with prior approval by the District.

Comment No.	Commenter	Question/Comment	District Response
51	Arlene Stewart	If someone needed water for a house in the South Florida District outside of Disney – and it was a new CUP – just how far would it travel from? 5 miles? 10 miles? Would it be on existing pipe line? Is there really a distance or is really a function of what is cost prohibitive? Is it where there is a will, there is a way? You wouldn't want to pull water from a place in Brevard and ship it to Broward, though who knows?	The questions are related to how the proposed Kissimmee water reservations affect potable supply (domestic self-supplied) wells for home builders. In those cases, the Upper Floridan aquifer is the typical source for private potable wells and they are not affected by the water reservations as that source is not considered a reservation withdrawal. Domestic self supply wells are covered under permits by rule, they do not need to apply for a CUP. As far as relating to piping costs, that is not a CUP issue. CUPs focus on the potential impacts of the withdrawals from a source (surface or groundwater).
52	Susan Gosselin	Could you please send me the two charts that were in the presentations showing available water based on Lake Toho need and Lake Toho plus Lake O? I have to go over this with senior staff. I have to explain what we may and may not be able to consider for conceptual projects in our upcoming Master Surface Water Management plan. I know that dispersed water is exempt from these conditions, to a degree, but water farming for consumptive use is not.	Hi Susan: Attached are the two tables I believe you were requesting. Let me know if you need anything else. All of the presentations will be available online on our reservations webpage, at https://www.sfwmd.gov/our-work/water-reservations on the Kissimmee tab.
53	Chad Allison	Is the District still pursing land acquisition within this area in support of the overall goals and mission?	Land acquisition for the Kissimmee River Restoration project is virtually complete. Other projects that are being planned for the Kissimmee Basin, such as the Lake Okeechobee Watershed Restoration Project, may be authorized to acquire additional lands in the future. These projects support environmental goals in the Kissimmee Basin and Lake Okeechobee.
54	Dave Markett	Don, I tried to ask this question, but could not make Q&A work -- If the purpose of this group effort is to enhance fish and wildlife, then why wasn't the subject of annual littoral improvement through a dedicated program of littoral burning during dryer periods to remove organics and expand herbaceous growth mentioned?	Thanks for your question Captain Dave. The purpose of the water reservation is not to enhance fish and wildlife, but rather move forward in adopting a rule that prevents future groundwater and surface water withdrawals from taking water that is necessary to meet the Kissimmee River Restoration Project goals and adversely impacting fish and wildlife in the Upper Chain of Lakes. As Toni Edwards indicated in the first presentation, a water reservation does not guarantee the proliferation of fish and wildlife. The focus behind this reservation process is to use solid science to determine the needs of all fish and wildlife and then make sure the water (hydrology) they need is protected in the future. Enhancement type projects for lakes, such as managed drawdowns, are separate from the water reservation process. The draft rules do not preclude these types of enhancement projects from occurring in the future. Hope this answers your question. We are glad to answer any others.

Comment No.	Commenter	Question/Comment	District Response
55	Shirley Wiseman	As a property owner, in business on the chain, I am representing 80 families that have serious reservations about the water levels that are maintained in this area. Why must you draw down the lake so that it may not be accessed by boaters that come here to fish and have such low levels to access the lake they do not stay and spend their money in our area. We are dependent on the "snow birds" vacationing in our area. The State is deprived of tourist income when an arbitrary ruling is imposed on our area. There are many lakes in Alabama and Georgia that tourist leave our area and utilize. Please consider the cost to business and the State for tourist revenue. Leave Lake Kissimmee at a 52 to 54 level.	Annual minimum lake levels are established by the USACE Regulation schedules, which is an entirely different topic than the water reservation rule development process. However, variation in water levels, including lower lake levels, are important to lake ecology. The Florida Fish and Wildlife Conservation Commission is an excellent source for information regarding why lakes need variability in water levels. The Northeast Regional Office (352-732-1225) will direct any callers to the appropriate resources or biologist to answer questions.
56	STOPR Group	It appears that Lakes Toho and East Lake Toho are being regulated to the water reservation line (WRL) (referring to the recession lines associated with environmental releases) which in essence means that there is no water available during this time. If water is available as part of the rule that refers to "environmental releases," when your attempting to remove water from these lakes, what is the approval process to be able to capture this water? What are the specific mechanics of how water would be available along with the approval process? Does it still need to be done on a daily basis? Please explain.	During flood control or environmental release periods a permittee may submit a withdrawal request to the District using District Form 1393. The District intends to notify permittees in advance of when the spring releases are targeted to occur so they can make a timely request during these release periods. This temporary request form (1393) will be submitted to the District's Water Use Regulation Bureau for review. This form may allow a weekly or bi-weekly timeframe rather than daily checks to determine if withdrawals are allowed. The form includes beginning and ending dates for withdrawals along with other conditions (such as specific lake stage limitations) associated with any such withdrawals.
57	OUC	The Draft Rule provides that "indirect withdrawals" of groundwater greater than 0.1 foot of drawdown from a reservation or contributing water body are considered to withdraw reserved water under certain circumstances. This language could be interpreted to apply to Floridan aquifer withdrawals, where such withdrawals induce drawdown in the surficial aquifer which in turn causes a 0.1 foot drawdown at a reservation waterbody. Clarify language to make it clear that any withdrawals from the Floridan aquifer do not use reserved water.	Acknowledged.

Comment No.	Commenter	Question/Comment	District Response
Q&A During and Following Workshop #4 (June 09, 2020):			
58	Taren Wadley	Considering there have not been any major commercial fish harvests in the Kissimmee chain for 50 years, as I am a master freshwater commercial haul seiner in Polk that catches tens of thousands of pounds of low to no value fish, considering I am the largest apex predator to freshwater, how can the water quality efforts ever be truly successful without these types of biomass harvests, leaving it to become reinfested by the same nongame and nonnative fish that are never harvested, nor identified by Florida Fish and Wildlife Conservation Commission as their gear is not selective to catch these species nor have they targeted them for 50 years, until they suggest after all these efforts to draw down our lakes and still not addressing these fish infestations nor allowing their biomass harvests?	This question and comment is outside of the scope of this water reservation rule. Please contact Florida Fish and Wildlife Conservation Commission for issues related to fishery regulations.
59	Diane Perry	Sounded like Kiss basin would like more water retained, can that help Lake O during hurricane season.	See response to comment 54 above.
60	Paul Gray	When water is available for allocation, how will applications be prioritized both in who gets it, and how much can individual parties get?	Applications will not be prioritized. To provide these assurances, the applicant shall analyze the effects of: i) the individual impact of the proposed withdrawal, and ii) the cumulative impact of the proposed withdrawal combined with all other permitted withdrawals from reservation and contributing waterbodies. These analyses shall demonstrate that the individual and cumulative withdrawals do not reduce average discharges at the S-65 structure by more than 4.18 percent as of [rule effective date], compared to a no-withdrawal condition over the range of hydrologic variability that occurred between 1965 and 2005.
61	Nicolas Porter	Is clarity on withdrawals from the Floridan aquifer system potentially influencing the surficial something you are still considering for revisions?	Withdrawals from Floridan aquifer system wells do not use reserved water.
62	George Farrell	Biocleaner is starting a cleanup on Moore's Creek in Fort Pierce on the 16th. Can someone attend?	This question is outside of the scope of this water reservation rule.
63	Paul Gray	Asked another way, what if X acre-feet are available but twice that amount of applications come in for it?	The 5% (currently 4.18%) at S-65 structure ensures that water is not over-allocated. Once the 4.18% reduction in average flows at S-65 is permitted - no additional consumptive use permits will be authorized. All permittees are subject to a daily evaluation of the lake stages compared to water reservation line prior to making a withdrawal. If the lake stage is at or below the water reservation line then withdrawals are not permitted for that day.

Comment No.	Commenter	Question/Comment	District Response
64	Gary Ritter	Once this becomes rule, will the Kissimmee River Reservation become part of the Lower Kiss Water Supply Planning process?	Yes, when the rule is officially adopted and effective, it would be discussed as part of the water supply plans for the Upper and Lower Kissimmee Planning Area and the Central Florida Water Initiative.
65	Hopping Green and Sams for Farmland Reserve, Inc.	WRL is set above the Ordinary High Water Line in Myrtle Preston Joel	The WRLs were established using the same methodology for all lakes. Maximum and minimum stages were set according to federal water regulation schedules (which preserves wetland extent and open water extent), and durations at high, low, and transitions between were established based on historical data from 1972-2019. Establishing WRLs lower than current regulated seasonal highs will reduce wetland extent, with impacts dependent on magnitude of consumptive use.
66	Hopping Green and Sams for Farmland Reserve, Inc.	Sole reliance on regulation schedule not fully explained and ignores other relevant data in Myrtle Preston Joel	As explained in the tech doc, seasonal highs and lows were established for each reservation waterbody based on the seasonal highs and lows of the regulation schedule. These schedules and their coincident water management operations have shaped littoral communities over decades. Historical water levels were used to establish how long WRLs were set at maximum stages in each waterbody, as well as breeding season (spring) water levels; resulting in unique WRLs tailored to the hydrology that shaped F&W habitat and use in each waterbody. More explanation regarding how these targets were set was added to the tech doc.
67	Hopping Green and Sams for Farmland Reserve, Inc.	Failure to employ site specific or current data in Myrtle Preston Joel	Habitat descriptions were provided for each reservation waterbody using the latest available information that could be applied consistently across the Kissimmee Basin. All waterbodies were mapped using aerial imagery and thousands of bathymetric measurements to create vegetation community descriptions and their general elevations (water depths). These results were compared with other data, including transect information provided in comments from Hopping Green and Sams, and were generally consistent, given the limited spatial scope of the transect data. The approach we chose provides consistency among all reservation waterbodies and the largest spatial extent available for each.

Comment No.	Commenter	Question/Comment	District Response
68	Gary Lee, Southport Ranch LLC	I was a participant for a portion of the aforementioned meeting on June 9th, however I lost internet connection as the result of work on the cell tower. As a result, I only got to attend a portion of the meeting. During the portion of the meeting that I was involved I did not hear any reference to the storm event levels that have historically been utilized in evaluating water control initiatives. As an impacted property owner it is necessary to determine the efforts that are being undertaken by the SFWMD and the adverse impact to the Southport Ranch property. Could you please advise the intended impact to the water levels for the areas located south of Lake Tohopekaliga.	This area is hydrologically connected to the Headwater Lakes (via Reedy Creek), but is upstream of the resource. No withdrawals are being permitted from waterbodies south of Lake Tohopekaliga, so water levels will only be affected in this area through reduced flows from withdrawals upstream. These reductions are capped at what would equate to no more than a 5% reduction in average annual flow to the Kissimmee River. The timing of these reductions will primarily occur when the water is considered excess of downstream needs (Lake O releases are being made and water levels are above WRLs in individual waterbodies) and are not expected to significantly change the hydrology of the Headwater Lakes and the dependent plant communities. As for flood risks to properties surrounding the water reservation waterbodies, that is outside the scope of this rule. Those risks are evaluated and regulated through the Army Corps of Engineers regulation schedules for each waterbody.
69	Gary Lee, Southport Ranch LLC	"…the study underway does not consider the historic 10 year, 50 year, and 500 year storm event levels as determined by the Army Corps of Engineers."	Army Corps of Engineers' regulation schedules are not changing and are not the focus of the Kissimmee River and Chain of Lakes water reservations; flood control is outside the scope of this water reservation efforts.

APPENDIX H: PUBLIC COMMENT LETTERS RECEIVED AFTER RULE DEVELOPMENT WORKSHOPS #3 AND #4

This appendix contains formal, written public comment letters received after public rule development Workshop #3 (April 17, 2020) and Workshop #4 (June 09, 2020). The workshop agendas and other comments and questions received during and after the workshops are provided **Appendix G**. All written comments were reviewed by SFWMD, and where appropriate, they were addressed in subsequent drafts of the technical document and rules.

OUC The Reliable One®

May 15, 2020

By Email (tedwards@sfwmd.gov)

Ms. Toni Edwards
Senior Scientist
Applied Sciences Bureau/Coastal Ecosystems Section
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33406

RE: OUC Comments on Kissimmee River and Chain of Lakes Water Reservation Rule Development

Dear Ms. Edwards:

Please accept this letter as Orlando Utilities Commission's ("OUC") comments regarding the South Florida Water Management District's ("District") proposed Kissimmee River and Chain of Lakes Water Reservation Draft Rules ("Draft Rule").

OUC operates a distribution system consisting of seven active water treatment plants and 32 active production wells which obtain water from the Lower Floridan aquifer. OUC's service area is located within both the South Florida Water Management District and the St. Johns River Water Management District. To keep up with this growth, OUC has built and expanded seven water plants, invested in conservation and reclaimed water projects, and has committed to developing alternative water supply projects. OUC has been an active participant in the Central Florida Water Initiative process, collaborating with other utilities, water management districts, and the Florida Department of Environmental Protection to address regional water supply planning and regulation in the Central Florida area.

OUC has also been an active participant in the ongoing development of reservations for the Kissimmee River for the last decade, having submitted comments to the District on previous versions of draft rule. With the re-initiation of rule development, on April 17, 2020 the District conducted a rulemaking workshop to discuss the status of the Draft Rules. The comments contained herein are in response to the Draft Rule discussed at the April 17, 2020 workshop.

OUC's primary concern with the Draft Rule is the potential for confusion regarding the applicability of the water reservation to the withdrawal of groundwater from the Floridan aquifer. Based on the District's prior modeling and technical

May 15, 2020
Page 2 of 2

evaluations, as well as staff comments at the rulemaking workshop, OUC understands the District has determined that the Floridan aquifer is well isolated from the reservation water bodies and that the surficial aquifer system in the area is essentially unaffected by Floridan aquifer system withdrawals.

Accordingly, the draft Applicant's Handbook Section 3.11.5.A.7 states that withdrawals from the Floridan aquifer system do not withdraw reserved water. Based on statements at the workshop and the demonstrated confinement between the surficial aquifer and Floridan aquifer in the reservation area, it appears the intent of the Draft Rule is to exclude Floridan aquifer groundwater withdrawals from the proposed reservation.

However, the Draft Rule also provides that "indirect withdrawals" of groundwater greater than 0.1 foot of drawdown from a reservation or contributing water body are considered to withdraw reserved water under certain circumstances. This language could be interpreted to apply to Floridan aquifer withdrawals, where such withdrawals induce drawdown in the surficial aquifer which in turn causes a 0.1 foot drawdown at a reservation waterbody. In order to clarify this situation, OUC requests that the exclusion in Section 3.11.5.A. of the Applicant's Handbook clearly states that indirect withdrawals from the surficial aquifer system caused by Floridan aquifer system withdrawals likewise do not withdraw reserved water as follows:

> 7. Withdrawals from the Floridan aquifer system, regardless of whether the withdrawal from the Floridan aquifer system causes any drawdown of the SAS or an indirect withdrawal from a reservation or contributing waterbody.

This proposed revision would clarify the intent of the Draft Rule and eliminate any conflicting interpretations regarding Floridan aquifer withdrawals.

Thank you for your consideration of these comments. We look forward to the District's response and future rule drafts. Please feel free to contact me if you have any questions at 407-434-2565 or at crussell@ouc.com.

Sincerely,

Signature Redacted

Christine Russell, P.E.
Manager, Water Resources & Compliance
OUC

May 15, 2020

VIA EMAIL
tedwards@sfwmd.gov

Mrs. Toni Edwards, Senior Scientist
Coastal Ecosystems Section
South Florida Water Management District
P.O. Box 24680
West Palm Beach, FL 33406

Re: Comments on draft Kissimmee Basin Water Reservation Rule, Sections to the Applicant's Handbook, and Technical Documents

Dear Mrs. Edwards,

The City of St. Cloud, Toho Water Authority, Orange County Utilities, Polk County Utilities, and Reedy Creek Improvement District (STOPR Group) appreciate the opportunity to review and comment on the draft Kissimmee Basin Water Reservation (KBWR), including draft changes to Chapter 40E-10, Florida Administrative Code (F.A.C.), pertinent draft sections of the *Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District*, and a draft report titled, *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes*.

The group respectfully submits the comments provided in **Attachment 1** regarding the above-referenced documents. Of note, the group feels Subsection 3.11.5.A of the draft sections of the *Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District* on uses that do not withdraw reserved water should be reworded to be clearer. We suggest this Subsection be modified as follows:

- Insert a new Number 3 that states, "Withdrawals of any type pursuant to allocations (total annual and maximum monthly) set forth in permits involving a direct withdrawal of surface water or an indirect withdrawal of groundwater issued prior to _______________[insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5]."

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- Renumber existing Number 3 as 4 and change the text as follows: "A permit modification, transfer, reallocation or renewal of a permit issued before (in the case of a withdrawal subject to subparagraph 3) or after (in the case of a withdrawal subject to rule 40E-10 and A.H. 3.11.5) _____________ [insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5] involving a direct withdrawal of surface water or an indirect withdrawal of groundwater that: a) does not change the source, increase the allocation, or change the withdrawal location (e.g., replacement of an existing well or surface water pump with similar construction and at a similar location); b) results from ~~in~~ crop changes that do not change the allocation or timing of use; or c) ~~a~~ decreases the permit ~~in~~ allocation."

- Insert a new Number 5 that states, "If the stage operating schedule of a permit issued prior to __________________ [insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5.] is more restrictive than the surface water reservation stage set forth in Appendix 4 of Rule 40E-10.071, upon the request of the permittee, the District shall conform the schedule in the permit to that of the rule, so long as the modification does not increase the total annual and maximum monthly allocation in the permit.

We appreciate the Districts' consideration of the group's comments.

If you have any questions or would like to discuss any of the comments further, please feel free to contact us.

Submitted on behalf of the STOPR Group:

By:

Signature Redacted

Digitally signed by Todd Swingle
Date: 2020.05.15 18:19:24 -04'00'

Todd P. Swingle, P.E.
Executive Director
Toho Water Authority

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ATTACHMENT 1

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Kissimmee Basin Water Reservation (April 2020 Draft)
STOPR Review Comments

Below, on behalf of the St. Cloud-Toho Water Authority-Orange County Utilities-Polk County Utilities-Reedy Creek Improvement District (STOPR) Group, please find comments on the South Florida Water Management District's (District's) Kissimmee Basin Water Reservation (KBWR), including draft changes to Chapter 40E-10, Florida Administrative Code (F.A.C.), pertinent draft sections of the *Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District*, and a draft report titled, *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes*.

Comments on Proposed Changes to Chapter 40E-10, F.A.C.

1. ***40E-10.021(j) Definition of Contributing Water Bodies and 40E-10.071 Descriptions of Contributing Water Bodies***: The definition of "Contributing Water Bodies" in 40E-10.021 is inconsistent with the descriptions of "Contributing Water Bodies" provided under each water reservation area in 40E-10.071 in that it does not include surficial aquifer groundwater. In addition, the descriptions of "Contributing Water Bodies" in 40E-10.071 state, "Groundwater from the surficial aquifer system and surface water that is required…" This does not place any limits on the extent of the surficial aquifer groundwater system the rule intends to encompass for contributing water bodies. We suggest one of the two following options to clarify this issue:
   - Delete the discussion of groundwater from the "Contributing Water Bodies" sections under each water reservation area contained in 40E-10.071. Change the "Groundwater" sections under each water reservation area contained in 40E-10.071 to read, "Surficial aquifer system groundwater contributing to [Insert Water Reservation Body Name] and associated Contributing Water Bodies that is required…"; or
   - Change the "Contributing Water Bodies" sections under each water reservation area contained in 40E-10.071 to say, "Surface water and surficial aquifer system groundwater that contributes to surface water that is required…" Modify the definition of "Contributing Water Bodies" in 40E-10.021 to include surficial aquifer system groundwater.
2. ***Appendix 4***: The extents of Contributing Water Bodies are represented graphically in the figures in Appendix 4. However, the precise limit of each of these Contributing Water Bodies is not defined or established in the draft rule or Applicant's Handbook (e.g., "Bonnett Creek South of US 192"). The draft report titled, *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes* appears to contain descriptions of the limits of Contributing Water Bodies. We suggest these descriptions of the limits of Contributing Water Bodies be reflected in the rule or the Applicant's Handbook, as appropriate.
3. ***Appendix 4, Figure 4-1***: Adjust the northern extent of the figure to show all of the section of Shingle Creek that is being proposed as a Contributing Water Body.

Comments on Proposed Changes to *Applicant's Handbook*

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1. ***Subsection 3.11.5.2.b***: The threshold for being defined as an indirect withdrawal of groundwater is 0.1 feet of drawdown in the surficial aquifer system at the landward edge of the reservation waterbody. Does the proposed rule apply to temporary surficial aquifer system dewatering activities? If not, this type of use should be added to the list of uses that do not withdraw reserved water under Subsection 3.11.5.A.

2. ***Subsection 3.11.5.A***: This section provides a listing of uses that do not withdraw reserved water. The subsection is unclear as written. Consistent with staff comments made during the public workshop/webinar, we request this provision be modified as follows:

   - Insert a new Number 3 that states, "Withdrawals of any type pursuant to allocations (total annual and maximum monthly) set forth in permits involving a direct withdrawal of surface water or an indirect withdrawal of groundwater issued prior to _______________[insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5.]."
   - Renumber existing Number 3 as 4 and change the text as follows: "A permit modification, transfer, reallocation or renewal of a permit issued before (in the case of a withdrawal subject to subparagraph 3) or after (in the case of a withdrawal subject to rule 40E-10 and A.H. 3.11.5) _____________[insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5] involving a direct withdrawal of surface water or an indirect withdrawal of groundwater that: a) does not change the source, increase the allocation, or change the withdrawal location (e.g., replacement of an existing well or surface water pump with similar construction and at a similar location); b) results from ~~in~~ crop changes that do not change the allocation or timing of use; or c) ~~a~~ decreases the permit ~~in~~ allocation."
   - Insert a new Number 5 that states, "If the stage operating schedule of a permit issued prior to ___________________[insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5.] is more restrictive than the surface water reservation stage set forth in Appendix 4 of Rule 40E-10.071, upon the request of the permittee, the District shall conform the schedule in the permit to that of the rule, so long as the modification does not increase the total annual and maximum monthly allocation in the permit.

3. ***Subsection 3.11.5.B.2.a.i***: This subsection indicates that the use of water from a reservation water body must be demonstrated to be a "supplemental" supply used in conjunction with other "primary" sources of water. Many public supply utilities and other permitted use types in the region use groundwater from the Floridan aquifer system as their existing "primary" supply source, and surface water from the Kissimmee Basin would supplement those fresh groundwater sources. Under a conjunctive use operating protocol, an applicant might determine that prioritizing the use of available surface water over fresh groundwater may be beneficial to the operation of their system due to the annual and seasonal availability of the surface water supply. Conversely, an applicant might determine that prioritizing the use of fresh groundwater over available AWS supplies is more economically feasible. Operational and economic decisions of this nature should be the decision of the applicant. As such, terms like "supplemental" and "primary" that imply an applicant should implement a particular withdrawal priority of their supply sources could be unnecessarily constraining and may not be the District's intent. In addition, seasonal storage should be allowable in addition to a conjunctive use strategy with other supply sources. We suggest this section be changed as

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follows, "Demonstrating the proposed withdrawals in combination with other sources of water and/or storage ~~represent a supplemental supply used in conjunction with other primary source(s) of water such that the source(s), used in combination,~~ meet the reasonable-beneficial needs of the use."

4. ***Subsection 3.11.5.B.2.***: This subsection indicates the daily allocation should be based on the reasonable-beneficial demand for the use class as calculated pursuant to Section 2.3 [*Applicant's Handbook*] and the rated capacity of the associated withdrawal facility, whichever is less. The "whichever is less" clarifier in this subsection could be unnecessarily constraining to the implementation of conjunctive use. An applicant may be able to withdraw more surface water on a daily basis, based on the Water Reservation Line, than the demand that could be demonstrated pursuant to Section 2.3 [*Applicant's Handbook*]; however, the applicant could put this additional withdrawn water into storage or could incorporate the use of this water as part of a conjunctive use strategy without causing harm to the system. It is suggested to reword this subsection as follows, "The daily allocation shall be proposed by the applicant and based on the reasonable-beneficial demand for the use class, as calculated pursuant to Subsection 2.3 of the Applicant's Handbook, ~~and~~ the rated capacity of the associated withdrawal facilities, ~~whichever is less~~or other documented withdrawal capacities required to meet the reasonable-beneficial needs of the use as approved by the District."

5. ***Subsection 3.11.5.B.2.b.***: This section requires the use of the UK-OPS Model to perform the required assessment of downstream impacts associated with a proposed surface water withdrawal. It is standard practice as part of water use permits for groundwater sources that applicants use a Water Management District groundwater flow model, but make specific changes to better represent project-specific or local information. Any changes are reviewed and approved by the District. In addition, the District may want to make future changes to the model themselves, which may be hindered if the District adopts the use of a specific version of a model by rule. We suggest the following change to the last sentence of this subsection, "The applicant shall use the latest version of the District's Upper Kissimmee-Operations Simulation (UK-OPS) Model ~~(Version 3.12)~~, which is incorporated by reference in Rule 40E-2.091, F.A.C., as the basis to conduct this impact assessment or applicant-proposed changes to the UK-OPS Model to represent project-specific or local data or information."

7. ***Subsection 5.2.2.C.2.d.*****:** This subsection indicates that a permittee can request to withdraw water from a reservation water body when the District is discharging from the water body for flood protection, operations and maintenance, or environmental reasons. However, permittees will need to know about these occurrences in order to plan operations. We suggest inserting the following text as the second sentence in this paragraph, "The District shall notify existing permittees of a direct withdrawal of surface water or an indirect withdrawal of groundwater at least 30 days in advance of such discharges."

8. ***Subsection 5.2.2.K.9.b.*****:** The proposed Special Permit Condition for withdrawals from reservation water bodies indicates that withdrawals will be permitted if the stage in a reservation water body is above the water reservation stage based on the stage recorded from specific monitoring device and posted by the District on DBHYDRO at 10:00 am. The condition goes on to indicate that if the stage is flagged as an error in DBHYDRO that the applicant is not permitted to make withdrawals until that error is corrected by the District. The reliability of a permittee's water supply system should not be subject to errors in the District's database. This condition should be changed to, "If any of the District's daily water level data

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in DBHYDRO are flagged for possible error, noted by a "?" next to the daily reading, then the permittee may ~~not~~ make withdrawals if the daily stage the previous day was above the water level schedule ~~until the data are corrected or validated~~. The permittee may continue to make withdrawals each day until the District fixes the errors in DBHYDRO."

9. ***Subsection 5.2.2.K.9.c.*:** This subsection indicates that a permittee can withdraw water from a reservation water body if regulatory releases from Lake Okeechobee to the Caloosahatchee River or St. Lucie Estuary are being made. However, this subsection does not indicate how a permittee is to determine whether these releases are being made on any given day. We suggest the following sentences be added to the end of this subsection, "Withdrawals from (name of the reservation or contributing water body) will be permitted for the next 24-hour period only when discharge is occurring at the District monitoring stations for [insert monitoring station numbers] as reported in DBHYDRO, recorded at 10 AM each day. If any of the District's daily water level data in DBHYDRO are flagged for possible error, noted by a "?" next to the daily reading, then the permittee may make withdrawals if the discharge the previous day was occurring at [insert monitoring station numbers]."

52895024;1

H.E.R.O.

HERITAGE AND ENVIRONMENT RESOURCES OFFICE

May 18, 2020

Toni Edwards
Senior Scientist
Coastal Ecosystems Section
South Florida Water Management District
P.O. Box 24680
West Palm Beach, FL 33406
Submitted electronically to: **tedwards@sfwmd.gov**

RE: Seminole Tribe of Florida's Comments on Draft Kissimmee River and Chain of Lakes Water Reservations

Dear Ms. Edwards:

The Seminole Tribe of Florida ("Seminole Tribe") is in receipt of the draft Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes dated April 2020 ("Technical Document"), and the draft rules and relevant parts of the Applicants Handbook for Water Use Permit Applications within the South Florida Water Management District ("SFWMD"). The Seminole Tribe appreciates the opportunity to comment on the above-referenced draft documents, and is therefore, submitting this letter in order to document some of the Tribe's initial concerns.

Although the SFWMD states that the Kissimmee River and Chain of Lakes Water Reservations will not reduce the flow to Lake Okeechobee, only the timing, the Seminole Tribe was disappointed to find that dispersed water management ("DWM") projects are exempt from the Kissimmee River and Chain of Lakes Water Reservations Rule. While the Seminole Tribe supports true wetland restoration and conservation, we continue to have concerns with practices that will diminish, reduce or otherwise impact our ability to obtain our water rights under the *Water Rights Compact between the Seminole*

ERMD | SEMINOLE TRIBE OF FLORIDA AH-TAH-THI-KI MUSEUM A PLACE TO LEARN, A PLACE TO REMEMBER | TRIBAL HISTORIC PRESERVATION OFFICE

Sr. Director and Tribal Historic Preservation Officer, Dr. Paul N. Backhouse	Tribal Historic Preservation Office Director Ms. Anne Mullins	Director of the Ah-Tah-Thi-Ki Museum Ms. Kate Macuen	Director of the Environmental Resources Management Department Mr. Kevin Cunniff

"THE LAND I WAS UPON I LOVED; MY BODY IS MADE OF ITS SANDS. COACOOCHEE."

H.E.R.O.

HERITAGE AND ENVIRONMENT RESOURCES OFFICE

Tribe of Florida, the State of Florida, and the South Florida Water Management District ("Compact"). The Seminole Tribe has a significant interest in DWM projects since these projects allow landowners to convert farm and other agricultural lands to water storage facilities, which have the potential to impact the Seminole Tribe's rights and interests. Projects such as DWM projects, redirect and retain water that has been arbitrarily determined as "excess," and do not have the same limitations on withdrawal that the Tribe has insisted be applied to those projects near Brighton, namely that they can fill them only when there is excess water in the system.

The rationale provided by the SFWMD, at the April 17, 2020, public rulemaking workshop for exempting these types of projects, is that DWM projects do not confer any water rights and further that they "restore hydroperiods." The Seminole Tribe has at various times, and in regard to various projects, submitted comments to the SFWMD regarding DWM projects, and expressed our concerns relative to the cumulative impacts of DWM projects to the delivery of the Seminole Tribe's water rights. The survival of the Seminole Tribe and its environmental resources depends on sufficient fresh water supply. As you are aware, the Seminole Tribe's Brighton Reservation is located in the Indian Prairie and Lakeshore Perimeter Basins, and the Tribe's water rights are derived from flows from Lake Istokpoga, Lake Okeechobee and basin rainfall. Therefore, DWM projects which capture water that previously flowed to Lake Okeechobee, ultimately from the Kissimmee River, potentially put the Tribe's future water use at risk. It does not appear that the cumulative effect of these actions have been analyzed, therefore there is a potential for increased risk to the delivery of the water rights to the Seminole Tribe, as well as the needs of other Lake Okeechobee users.

The Seminole Tribe appreciates the hard work and commitment the South Florida Water Management District has applied to this rulemaking effort. The Seminole Tribe of Florida remains committed to continuing to engage in the rulemaking process, and reserves the right to revise our comments after a more thorough technical review and as more information becomes available. Thank you for your consideration of these comments. If you have any questions or concerns, please do not hesitate to contact me.

ERMD SEMINOLE TRIBE OF FLORIDA AH-TAH-THI-KI MUSEUM A PLACE TO LEARN. A PLACE TO REMEMBER. TRIBAL HISTORIC PRESERVATION OFFICE

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"THE LAND I WAS UPON I LOVED; MY BODY IS MADE OF ITS SANDS. COACOOCHEE."

H.E.R.O.

HERITAGE AND ENVIRONMENT RESOURCES OFFICE

Sincerely,

Signature Redacted

Paul N. Backhouse, Ph.D., RPA
Senior Director, Heritage and Environment Resources Office,
Tribal Historic Preservation Officer

"Our traditional Seminole cultural, religious, and recreational activities, as well as commercial endeavors, are dependent on a healthy South Florida ecosystem. In fact, the Tribe's identity is so closely linked to the land that Tribal members believe that if the land dies, so will the Tribe."

ERMD

SEMINOLE TRIBE OF FLORIDA
AH-TAH-THI-KI
MUSEUM
A PLACE TO LEARN. A PLACE TO REMEMBER.

TRIBAL HISTORIC PRESERVATION OFFICE

Sr. Director and Tribal Historic Preservation Officer, Dr. Paul N. Backhouse	Tribal Historic Preservation Office Director Ms. Anne Mullins	Director of the Ah-Tah-Thi-Ki Museum Ms. Kate Macuen	Director of the Environmental Resources Management Department Mr. Kevin Cunniff

"THE LAND I WAS UPON I LOVED; MY BODY IS MADE OF ITS SANDS. COACOOCHEE."

Date: May 18, 2020

To: Toni Edwards, Coastal Ecosystem Section, SFWMD

From: Rebecca Elliott, Office of Agricultural Water Policy, FDACS

RE: 1) DRAFT Upper Chain of Lakes, Headwaters Revitalization Lakes and Kissimmee River Water Reservation Rule 40E-10.021 dated April 06, 2020
2) DRAFT Applicants Handbook 3.11,5 Upper Chain of Lakes, Headwaters Revitalization Lakes, and Kissimmee River dated April 06, 2020
3) DRAFT Applicants Handbook 5.2.2 Compliance, Monitoring and Reporting Section K. 9. Specific Region Special Conditions dated April 06, 2020
4) Draft Technical Document dated April 3, 2020

The Florida Department of Agriculture and Consumer Services (FDACS) appreciates the opportunity to provide comments on the on the draft Upper Chain of Lakes, Headwaters Revitalization Lakes and Kissimmee River Water Reservation Rule 40E-10.021, draft Applicants Handbook 3.11,5 Upper Chain of Lakes, Headwaters Revitalization Lakes, and Kissimmee River, and draft Applicants Handbook 5.2.2 Compliance, Monitoring and Reporting Section K9 Specific Region Special Conditions and the Draft Technical Document.

The establishment of a water reservation rule for the Upper Chain of Lakes, Headwaters Revitalization Lakes and Kissimmee River is complex and technically challenging. The time and effort required by staff to develop the draft rules and technical support document is acknowledged.

General Comments

The "water reservation line" blends several categories of water use. It not only includes water reserved from additional consumptive use permit allocations for the protection of fish and wildlife but also the water already allocated to existing legal uses, water for a number of exempt uses and those that fall under the permitting threshold. As such, it represents more a protection of a base condition water use similar to a water availability rule rather than a reservation that identifies the quantities of water to be reserved for the protection of fish and wildlife.

Since the reservation quantity has not been determined separate from the base condition water use, a misconception may arise that when water use is occurring below the "water reservation line", existing legal uses are taking water reserved for the protection of fish and wildlife. The rule language refers to Subsection 3.11.5 of the Applicant's Handbook to specify what is or isn't reserved in the quantity below the "water reservation line". It seems appropriate to refer to the Applicant's Handbook for reservation water body surface water as well as for groundwater and contributing water bodies. Please see comment 2 below for further details on including "in accordance with Subsection 3.11.5 of the Applicant's Handbook" for all source categories for all

reservation and contributing water bodies. Consider including a definition for the "Water Reservation Line" that defines it as a base condition water use line that includes the categories listed above.

This rule is different from all other reservation rules in not only identifying what water is reserved, but also establishing consumptive use permitting criteria to allow the additional or increased allocation of non-reserved water on a less than 1:10 level of service basis. The use of this non-traditional water source can be advantageous for water supply and in reducing water levels throughout the system during wet conditions but must be managed to preclude the occurrence of unintended consequences during dry conditions. Subsection 3.11.5 of the Applicant's Handbook includes an Assessment of Downstream Impacts to the Kissimmee River and Assessment of Downstream Impacts to Existing Legal Users in the Lake Okeechobee Service Area. Both assessment sections provide broad concepts without specific criteria. Consider providing additional criteria to guide applicant assessments and avoid inconsistent assessments and unintended dry season impacts to the Kissimmee River and Lake Okeechobee Service Area. Please see comments 11 and 13 below.

Detailed Comments

DRAFT Upper Chain of Lakes, Headwaters Revitalization Lakes and Kissimmee River Water Reservation Rule 40E-10.021:

1) Consider adding a definition for "Water Reservation Line" that defines the water below the line as including water reserved from additional and increased consumptive use permit allocations for the protection of fish and wildlife and base condition water use for water already allocated to existing legal uses, water for exempts uses and those that fall under the permitting threshold.

2) In order to be consistent with Subsection 3.11.5 of the Applicant's Handbook, it seems appropriate to add "in accordance with Subsection 3.11.5 of the Applicant's handbook to the end of 40E-10.071 (1)(a)1., (b)1. (c)1.,(d)1.,(e)1.,(f)1., (2)(a) and (3)(a). Another approach could be to change the language to say something like "All surface water …up to the water reservation stages depicted….in Figure XX and listed in Table XX is not available for additional or increased allocations to reserve water for the protection of fish and wildlife" or "reserved from further water use allocations for the protection of fish and wildlife".

3) Hydrograph Figures titles also state that all water up to the water reservation line is reserved from allocation for protection of fish and wildlife. Consider changing text to something like "All surface water up to the water reservation line is not available for additional allocations to reserve water for the protection of fish and wildlife" or reserved from further water use allocations for the protection of fish and wildlife."

4) Consider adding where the water reservation stages for the hydrographs are measured to the hydrograph figures to provide the location component to the reservation rule. This is already provided as S-65 for the Headwaters Revitalization figure 4-8B.

DRAFT Applicants Handbook 3.11,5 Upper Chain of Lakes, Headwaters Revitalization Lakes, and Kissimmee River

5) Line 32 – Including the words "or timing of use" is contrary to District rules that do not enforce a specific volume of allocation on a specified month. Although the modified Blaney-Criddle formula produces monthly volumes, District permit criteria allows agricultural users flexibility in making economic decisions on which crops to grow. District criteria currently provide some flexibility that would be useful to include in the proposed rule as well. Consider removing "or timing of use".

6) It would be useful to clarify whether exemptions still apply consistent with overall permit criteria such as indirect withdrawals of groundwater less than 100,000 gallons per day, short-term dewatering, and uses that qualify for a general permit by rule per Rule 40E-2.061.

7) It would be useful to clarify that an existing user seeking an increase in allocation from the surficial aquifer system will only need to provide an impact analysis based on the requested increase in allocation. If not, the language could penalize existing users seeking an increase in allocation versus those applicants seeking a first-time permit.

8) Line 54 & 55 – Consider an alternate Title such as "Criteria for Additional or Increased Water Use Permits Issuance for Ephemeral Daily Water from Upper Chain of Lakes Reservation or Contributing Waterbodies"

9) It might be appropriate to add the Headwaters Revitalization Lakes and Kissimmee River to Section B if indirect groundwater withdrawals from the reservation water body and contributing water bodies is allowed.

10) Section B pertains to a different type of permit allocation that is not based on the 1 in 10 level of service criteria that has been applied to existing legal uses. It would be helpful if the difference is made clear in the title and terms used for this section.

11) 3.11.5 B. b. Lines 87 – 101 Assessment of Downstream Impacts to the Kissimmee River – Line 97 & 98 refer to analyses "over the range of hydrologic variability that occurred between 1965 and 2005". Consider defining the time step or condition to be applied to the variability assessment, whether daily, weekly, monthly, seasonally, or based on representative dry, wet and average years. Application of the 4.18 percent cumulative impact needs to be consistent among permit applicants.

12) Although currently the same line, 3.11.5.C.1.b of the Handbook refers to the Headwaters Revitalization Schedule when it would be more appropriate to refer to the Headwaters Revitalization Lakes Reservation Line instead. The rule is proposed based on the District's reservation authority.

13) 3.11.5 B. c. Lines 102 – 111 Assessment of Downstream Impacts to Existing Legal Users in the Lake Okeechobee Service Area – The assessment proposed is based on the premise that there is excess water in the system when regulatory releases are being made to the Caloosahatchee River or St. Lucie Estuary. There is a great deal of uncertainty regarding whether this basis will be the same for the Lake Okeechobee System Operating Manual (LOSOM) being developed to replace the current schedule, the Lake Okeechobee Regulation Schedule 2008 (LORS08). The new schedule has the potential to provide regulatory releases even when Lake stages are low and excess water is not available. Currently, LORS08 may not have excess water given the time of year, tributary conditions, and weather forecasts. LORS08 regulatory releases in the Base Flow Sub Band can be tailored to meet environmental needs which creates more storage in the Lake for flood protection purposes even if there is not overall excess water in the system.

Changes in the timing of flows to Lake Okeechobee due to the Headwaters Revitalization Schedule are already expected and include a later start of wet season flows to Lake Okeechobee from the Kissimmee River. It is important that the reservation protect water needed to meet the Lake Okeechobee Minimum Flow and Level (MFL) during dry conditions and that it not decrease the water made available for the Lake Okeechobee Service Area, Stormwater Treatment Areas, and natural areas south of Lake Okeechobee.

In response to the uncertainties regarding LOSOM schedule under development which was not evaluated for the proposed Applicant's handbook criteria, consider adding some preventative measures such as not allowing withdrawals once a Lake stage has been reached that is protective of water supply for the Lake Okeechobee Service Area, the Lower East Coast Service Areas, and downstream natural areas in the latter part of the dry season from February 1 through May 30 unless special permission from the District is obtained during atypical wet events in the dry season.

DRAFT Applicants Handbook 5.2.2 Compliance, Monitoring and Reporting Section K. 9. Specific Region Special Conditions dated April 06, 2020

14) It would be useful for the District to maintain an updated list of permitted users so that future applicants can properly evaluate impacts with UK-OPS if such a list does not already exist.

DRAFT Technical Document dated April 03, 2020:

15) Sections 5.4.1 and 5.4.2 of the Technical Document provide a detailed analysis of the evaluation performed on existing legal users within the vicinity of the proposed reservation waterbodies. It is stated that fish and wildlife have adapted to these existing hydrologic conditions, historical data used for modeling includes historic uses (known or unknown), and the system is primarily driven by climate and operations. Therefore, the document appears to have an affirmative finding that existing legal uses or those exempt from regulation are not contrary to the public interest. It would be helpful for that finding to be plainly stated if such is the case.

Thank you for the opportunity to provide comments on the draft Upper Chain of Lakes, Headwaters Revitalization Lakes and Kissimmee River Water Reservation Rule 40E-10.021, draft Applicants Handbook 3.11,5 Upper Chain of Lakes, Headwaters Revitalization Lakes, and Kissimmee River draft Applicants Handbook 5.2.2 Compliance, Monitoring and Reporting Section K. 9. Specific Region Special Conditions, and draft Technical Document   If you have any questions regarding FDACS comments please contact Rebecca Elliott at (561) 682-6040.

Audubon | FLORIDA

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May 18, 2020

Toni Edwards
South Florida Water Management District
P.O. Box 24680
West Palm Beach, FL 33406

Via email: tedwards@sfwmd.gov

Re: Water Reservation Rules for the Kissimmee River and Chain of Lakes

Dear Mr. Edwards:

These comments address the South Florida Water Management District's (SFWMD) Draft "Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes" dated April 2020 (the Draft Reservation). The Kissimmee River Restoration Project (KRRP) is one of the most popular and publicly supported restoration efforts in Florida and Audubon remains highly supportive of the project. Once construction is finished, which is anticipated to occur sometime in 2020, the availability of adequate water is vitally important to give the project the proper hydrology to reach its full potential. Setting this water reservation is essential to that goal, especially in light of the prediction in the Central Florida Water Initiative (CFWI) that the greater Orlando area human population could grow as much as 50% in the next 20 years with a concomitant increase in water supply requirements.[1] Time is of the essence.

This is the third attempt by the SFWMD to adopt a reservation for the KRRP. The first two efforts did not reach resolution due to myriad complications. The effort currently underway incorporates an additional layer of analytical rigor by developing and applying the Upper Kissimmee – Operations Simulation Model (UK-OPS). The SFWMD has very successfully developed and used spreadsheet models of this type in other efforts and this new model passed peer review as the others have.

[1] Audubon Florida filed comments in response to the Draft Central Florida Water Initiative Regional Water Supply Plan on May 15, 2020 that highlight the importance of ensuring the health of natural systems and sustainability as a driving principle in managing for our water demands.

The UK-OPS model focuses on the Upper Chain of Lakes[2], the Headwaters Revitalization Lakes[3] and the Kissimmee River[4] covering about 17% (172,500 acres) of the 1,028,480 acre region that drains through the S-65 structure at Lake Kissimmee's outlet. These are termed "reservation waterbodies," and they are influenced by upstream water bodies termed "contributing waterbodies."[5] Average annual flow through the S-65 structure from the Upper Chain of Lakes (S-61 and S-63) is estimated as 53% of the total flow from Lake Kissimmee.

Determining thresholds of water levels and flows in lakes and rivers that are protective of fish and wildlife resources is a difficult exercise. We support the approach of setting upper and lower limits of flows that would be considered "protective," and using that range to set a value of a less than 5% reduction of flows from Lake Kissimmee as protective of fish and wildlife in the river floodplain, and for the major lakes in the Kissimmee Chain.

As has been a hallmark of the KRRP, the scientific basis for hydrological goals for fish and wildlife is exemplary. Chapter 4 and Appendix F of the Draft Reservation outline the links between hydrology and fish and wildlife requirements. There are comprehensive lists of all the vertebrate taxa to be encountered in the region (birds, fish, reptiles, amphibians, mammals) with specifics on their habitat and life requirements. They provide detailed relationships between hydrology and plant communities and build upon that to explain trophic linkages between the plant and animal communities. These sections are so technically sound that Audubon will recommend that the Florida Fish and Wildlife Conservation Commission rely heavily upon them in developing their upcoming management plans for these lakes, and others in Florida.

We support the Draft Reservation recommendation to reserve all the water in Lake's Kissimmee, Hachinehaw, and Cypress. We also support the approach for setting water reservation lines for the Upper Chain of Lakes. One concern about those lines is allowing withdrawals in the early part of the wet season when it remains unknown if the Upper Chain of Lakes will refill by the wet season's end. That withdrawal period is brief in most lakes, ending by July, so it may be prudent, but we will monitor this closely to see if issues arise.

The Draft Reservation includes a component that has a "downstream check" of water conditions in Lake Okeechobee and surrounding areas. The Kissimmee Chain of Lakes form 40% of Lake Okeechobee's upstream watershed and the Kissimmee River furnishes about half the Lake's annual inflow. Lake Okeechobee is the single most important feature for water management in South Florida and a large important ecosystem unto itself. It also is far enough from the headwaters that it can be in relative drought while the headwaters are wet. Therefore, the downstream check reduces the likelihood of harm to the lake, the Everglades and the Northern Estuaries. We strongly support this check.

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[2] Lakes Hart-Mary Jane, Lakes Myrtle-Preston-Joel, Alligator Chain of Lakes, Lake Gentry, Lake Tohopekaliga, East Lake Tohopekaliga, and associated canals.
[3] Lakes Kissimmee, Cypress, Hatchineha, and Tiger, and associated canals.
[4] To S-65E structure north of Lake Okeechobee; includes Istokpoga Canal and floodplain, C-38 Canal, and remnant river channels from S-65 to S-65E.
[5] Contributing waterbodies are defined as "all wetlands and other surface waters, including canals and 39 ditches, that contribute surface water to a reservation waterbody" and include Lakes Marion, Marian, Rosalita, Jackson and Weohyakapka.

A significant concern we have moving forward is whether other water supply activities in the region could siphon water away from the Kissimmee. For example, the contributing water bodies are upstream from the reservation waterbodies and significant water withdrawals (e.g., Shingle Creek) could be done before the reservation waterbodies reach their water reservation lines, creating a groundwater deficit that affects future surface flows to the reservation water bodies. An example of where this probably is occurring, but to an unknown degree, is water withdrawals from the Lake Wales Ridge that is a major recharge feature of surface water along its base and to the Floridian aquifer below.

The CFWI identifies water bodies that are not meeting their TMDLs presently, many of which are on the Lake Wales Ridge next to Kissimmee's contributing waterbodies (Fig. 1). The CFWI also looked at 50,000 acres of wetlands on the ridge and estimated that 37% are impaired for water levels related to groundwater pumping. Alarmingly, in the 20-year projection to the year 2040, rather than improvements, the CFWI envisioned all of these conditions to deteriorate, having 4 more lakes go into MFL violation and 47% of the wetlands being impaired. If the surface water bodies are showing this much impact, the recharge rate from the ridge also probably is decreasing. And as Floridian aquifer depletions in the CRWI region have been increasing, water supply interests increasingly rely on surface water, further threatening the Kissimmee flows.

The Southwest Florida Water Management District (SWFWMD) manages the Lake Wales Ridge where these problems are occurring, but the SFWMD is affected by them, perhaps significantly. The Lake Wales Ridge is but one place these cross-boundary effects are threatening the KRRP and water flows in South Florida. It is very important that the SFWMD, in moving forward with their part of the CFWI partnership, work vigorously to protect its water and resources from deficiencies in water management by neighboring municipalities and WMDs.

3

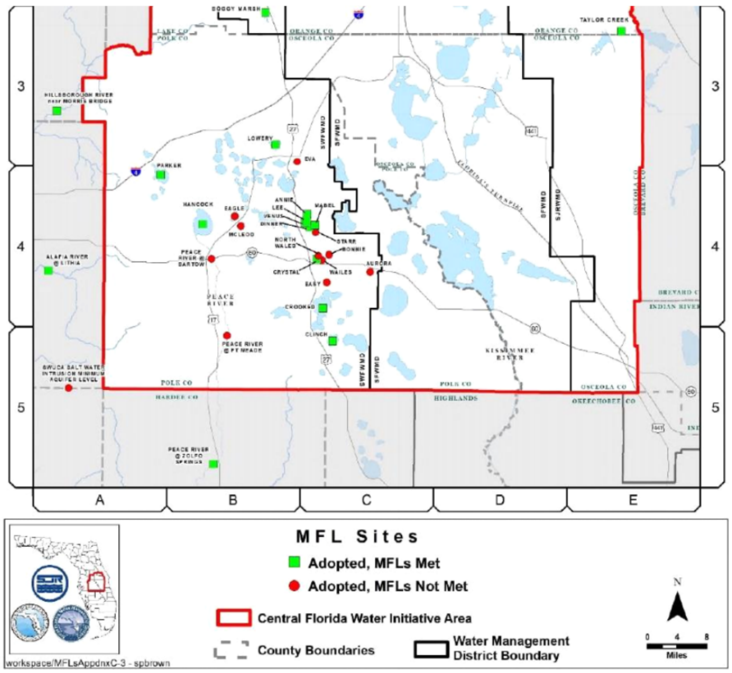

Figure 1. This is Figure C-2 of the CFWI draft document. Red shows water bodies that are not meeting their MFL goals and most are on the Lake Wales Ridge. The border between the Southwest and South Florida Water Management Districts is roughly along the base of the ridge and receives seepage flow from the ridge. Given the proximity of these MFL problems, the seepage flow probably is being reduced to the Kissimmee surface water systems (e.g., Lakes Marion, Pearce, Rosale, Weohyakapka and the streams they feed that flow to reservation lakes).

In summary, Audubon supports:

- Reserving all water in the Reservation waterbodies for fish and wildlife;
- The proposed water reservation lines in the Upper Chain of Lakes; and
- The “downstream check” for conditions in Lake Okeechobee and downstream of the lake.

Thank you for your consideration of our comments.

Sincerely,

Signature Redacted

Doug Gaston
Northern Everglades Policy Analyst

4

Hopping Green & Sams
Attorneys and Counselors

May 18, 2020

Toni Edwards
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33406

VIA e-mail: tedwards@sfwmd.gov

Re: Farmland Reserve, Inc.'s Third Comments on Proposed Kissimmee River Basin Water Reservation Rules

Dear Ms. Edwards,

Hopping Green & Sams, P.A. (HGS) represents Farmland Reserve, Inc. (FRI). On FRI's behalf, we submit the following comments regarding the South Florida Water Management District's (District) proposed Kissimmee River Basin Water Reservation rule draft dated April 6, 2020, and the accompanying Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes draft report April 2020 (Technical Report). By letters to the District dated January 14, 2015, and May 1, 2015, FRI previously commented on prior draft language of this proposed rule.

These comments supplement FRI's prior comments. In addition, FRI believes the District did not adequate address FRI's comments outlined in our May 1, 2015, letter. A copy of that letter is attached for reference as Attachment 1. Specifically, the District did not address FRI's comments that the water reservation line (WRL) for Lakes Myrtle, Joel and Preston were based solely on the Corps regulation schedule without considering private property boundaries, historic agricultural land use, and the contributing waterbodies and associated hydrology of these lakes and Lake Mary Jane.

FRI representatives made themselves available to District staff to discuss FRI's May 1, 2015, comments and potential means for resolving those comments. Despite FRI's efforts to reach out and engage the District to address these matters, they remain unresolved.

FRI understands the need and does not object to the District's overall proposal to reserve water in the Kissimmee River Basin for the protection of fish and wildlife and to further implement the restoration efforts for the Kissimmee River. However, with Lakes Myrtle, Joel, Preston, Mary Jane and Hart, and the contributing waterbodies associated with those reservation lakes, all of which are part of the Upper Chain of Lakes portion of this proposed reservation, the District has

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failed to consider key data in determining the WRL. These numerous technical omissions cause the WRL on these waterbodies to be arbitrary and capricious.

The specific Upper Chain of Lakes waterbodies and the technical errors associated with the WRL for these waterbodies are set forth below.

FRI Substantially Affected

As described in FRI's previous comment letters, FRI owns over 188,000 acres of land in Osceola County, approximately 19,277 acres of which are located within the Kissimmee River Basin. Several of the reservation waterbodies identified in the draft rule are located within or adjacent to the boundaries of FRI's lands, including Lakes Myrtle, Preston, and Joel and portions of Trout Lake and Center Lake. FRI has owned this land since the early 1950s.

FRI has historically conducted and currently conducts agricultural activities on its land, including cow-calf operations. These agricultural activities require the use of water for supplemental irrigation and cattle watering. Additionally, over a portion of this land, Osceola County has adopted a master development plan commonly referred to as the Northeast District that identifies potential future land uses which will require the use of water. Over other portions of this land, Osceola County has adopted a sector plan, known as the North Ranch Sector Plan, which also identifies future land uses requiring the use of water.

Because the proposed Kissimmee River Basin Water Reservation rule, if adopted, could potentially adversely impact FRI's ability to develop water supplies for its existing and future agricultural operations, and further could potentially impact the ability to develop water sources to meet the needs of development outlined in the Northeast District or in the North Ranch Sector Plan, FRI is substantially affected by the draft Kissimmee Basin Water Reservation Rule.

Issues Regarding Proposed Reservation Lake Stage Schedule for Lakes Myrtle, Preston and Joel

The proposed rule would reserve all the water in Lakes Myrtle, Preston and Joel, except for the month of June, up to the lake stage elevations determined by the WRL for these lakes set forth in the proposed rule. This WRL is technically and legally incorrect for the following reasons:

WRL Is Set above the Historic Ordinary High-Water Line and Reserves Water Beyond that Needed for Fish and Wildlife Protection and which will Continuously Flood Privately Owned Land

The District continues to propose a WRL of 62.0 feet NGVD29 for Lakes Myrtle, Preston and Joel based on the Army Corps of Engineers regulation schedule. As the District is aware, a court ordered Final Judgement to Quiet Title rendered May 22, 2009, clearly states the following:

> "…the State of Florida shall have no claim of title as to any and all lands lying in Township 25 South, Range 32 East and Township 25 South, Range 31 East, Osceola County, Florida, *at or above 60.5 NAVD88* lying landward of Lake Myrtle, Lake Preston and Lake Joel as depicted in the attached aerial photograph, prepared by Division Staff and dated April 22, 2009, which graphically represents the 60.5 foot elevation in relation to Lake Myrtle, Lake Preston and Lake Joel." [emphasis added]

In this geographic area, 60.5 feet NAVD88 $\approx$ 61.5 feet NGVD29. Therefore, the proposed rule sets the reservation water level at an elevation that is 0.5 foot higher than the ordinary high-water elevation. As such, the District proposes to reserve water in these lakes at levels beyond that needed to protect fish and wildlife and instead at levels that will lead to regular and periodic flooding of private land. Thus, the proposed rule is arbitrary and capricious.

Additionally, the proposed rule prescribes "indirect groundwater withdrawals from the surficial aquifer system if that withdrawal will cause a 0.1 foot or more drawdown *at the landward edge* of a reservation waterbody" (emphasis added). The proposed text of Chapter 40E-10 and the amendments to the Applicant's Handbook do not define the phrase "landward edge." However, section 3.5.2 of the Technical Document states that the landward extent of the Lakes Myrtle-Preston-Joel reservation waterbody is the regulated high state of 62 feet NGVD 29 (lines 653-654).

Section 3.5.2 of the Technical Document directly contradicts the court order set forth above setting the ordinary high-water line and landward extent of these lakes at 61.5 feet NGVD29. As such, the Technical Document and associated language of the proposed rule is an attempt to redefine the extent of privately-owned land and attempt to obtain ownership and use of such land without just compensation in contradiction of the US and Florida Constitutions.

The District should change the maximum elevation for the WRL for Lakes Myrtle, Preston and Joel to respect the ordinary high water line elevation of 61.5 NGVD 29. Making this change would allow the proposed rule to be consistent with private property ownership while still protecting fish and wildlife.

The Proposed WRL for Lakes Myrtle, Preston and Joel Does not Consider Long Term Agricultural Use on Surrounding Lands and Contains No Technical Support for the 0.1 Foot SAS Limitation

The WRL for Lakes Myrtle, Preston and Joel set forth in proposed rule 10.071(1)(b) (lines 67-74) did not consider ongoing agricultural land uses on privately owned land surrounding these lakes (i.e. land located above the 61.5 feet NGVD29 ordinary high-water line). In addition, the technical document contains no specific data justifying the 0.1-foot surficial aquifer drawdown constraint for these lakes.

WRL for Lakes Myrtle, Preston and Joel Fails to Consider Water Contribution from the Lake Colin Basin

The map in Figure 4-3A (page 8) of the proposed rule is erroneous because it contains a statement that there are no contributing waterbodies present. This map and the associated WRL for Lakes Myrtle, Preston and Joel fails to consider the water contributed to these lakes from the Lake Colin Basin, including its connection to Cat Lake. District staff was made aware of the Lake Colin Basin water contribution to these lakes through participation in the development of a regional drainage model for this basin by Donald W. McIntosh Associates several years ago but does not appear to have utilized this refined basin mapping, which was vetted through multiple reviews by the District, St. Johns River Water Management District, Osceola County and the Federal Emergency Management Agency.

Similarly, it does not appear from the Technical Report how the AFET-W model considered the water contribution from the Lake Colin Basin in the determining the WRL for Lakes Myrtle, Preston and Joel. Failing to include the Lake Colin Basin contribution to these waterbodies means that the District's modeling and technical approach for establishing the WRL on these lakes is deficient.

Sole Reliance on Regulation Schedule Not Fully Explained and Ignores Other Relevant Data

The District proposes to set the WRL for Lakes Myrtle, Preston and Joel based solely on the regulation schedule. Yet, the Technical Document (p.51, lines 1353-1350) notes that the regulation schedule for these lakes differs from the regulation schedule in the other Upper Chain of Lakes in that these lakes recede from a maximum in December rather than March of each year. The basis for this difference is not explained nor is there any explanation of how fish and wildlife are protected by this difference in the initiation of the recedence period.

Similarly, the Technical Document notes that the high stage for these lakes is based solely on hydrologic and basin studies of this area performed by the US Army Corps of Engineers in the early 1960s and not on any recent hydrologic or basin studies. Thus, use of the high stage for these lakes is not based on all known relevant information.

Failure to Employ Site-Specific or Current Data

In establishing the WRL for Lakes Myrtle, Preston and Joel, the District chose not to use site-specific data or the most current data the District knows are available for these lakes. For example, the vegetation elevations set forth on page 44 of the Technical Document are not consistent with field collected data previously provided to the District. Specifically, these vegetation elevations are not consistent with the vegetative cross sections and model data provided to the District by Breedlove Dennis and Associates and Donald W. McIntosh Associates during the 2015 rule review.

Issues Regarding Proposed Reservation Lake Stage Schedule for Lake Mary Jane

Failure to Consider Hydrologic Connection to the Econlockhatchee River or Disston Canal

The Technical Document's discussion of Lake Mary Jane (lines 630-649) fails to consider the hydrologic connection to the Econlockhatchee River, Disston Canal, or Roberts Island Slough. The omission of these hydrologic connections and effects of the same makes the Technical Document's discussion of Lake Mary Jane deficient.

Thank you for considering these comments. We look forward to working with District staff to address FRI's concerns identified herein and in FRI's previous comment letters on this rulemaking. If you would like to discuss the contents of this letter, please contact me.

Sincerely,

Signature Redacted

By: ____________________________

Eric T. Olsen., Esq.
Hopping Green & Sams
Attorneys for Farmland Reserve, Inc.

cc: Kent Jorgensen
Don Whyte
Michael Dennis
Jeff Newton

Hopping Green & Sams

Attorneys and Counselors

May 1, 2015

Don Medellin
Coastal Ecosystems Section
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33406

VIA e-mail: dmedelli@sfwmd.gov

Re: Farmland Reserve, Inc.'s Second Comments on Proposed Kissimmee River Basin Water Reservation Rules

Dear Mr. Medellin,

Hopping Green & Sams, P.A. (HGS) represents Farmland Reserve, Inc. (FRI) and offers on FRI's behalf the following comments regarding the South Florida Water Management District's (District) proposed Kissimmee River Basin Water Reservation rule draft dated December 9, 2014, and the accompanying draft Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes (Technical Report). By a letter to the District dated January 14, 2015, FRI provided comments on the prior draft language of this proposed rule. These comments supplement FRI's January 14, 2015, comments.

FRI Substantially Affected

As described in FRI's January 14, 2015, letter, FRI owns over 188,000 acres of land in Osceola County, approximately 19,277 acres of which are located within the Kissimmee River Basin. Several of the reservation waterbodies identified in the draft rule are located within or adjacent to the boundaries of FRI's lands, including Lakes Myrtle, Preston, and Joel and portions of Trout Lake and Center Lake. FRI has owned this land since the early 1950s.

FRI has historically conducted and currently conducts agricultural activities on its land, including cow-calf operations. These agricultural activities require the use of water for supplemental irrigation and cattle watering. Additionally, over a portion of this land, Osceola County has adopted a sector plan known as the Northeast District Sector Plan which identifies potential future land uses that will require the use of water. Over other portions of this land, Osceola County is considering adopting another sector plan, known as the North Ranch Sector Plan, which is also expected to identify future land uses that will require the use of water.

Because the proposed Kissimmee River Basin Water Reservation rule, if adopted, could potentially adversely impact FRI's ability to develop water supplies for its existing and future

Post Office Box 6526 Tallahassee Florida 32314 119 S. Monroe Street, Suite 300 (32301) 850.222.7500 850.224.8551 fax www.hgslaw.com

Attachment 1

agricultural operations, and further could potentially impact the ability to develop water sources to meet the needs of development outlined in the Northeast District Sector Plan or in the North Ranch Sector Plan, FRI is substantially affected by the draft Kissimmee Basin Water Reservation Rule.

Issues Regarding Proposed Reservation Lake Stage Schedule for Lakes Myrtle, Preston and Joel

The proposed rule would reserve all of the water in Lakes Myrtle, Preston and Joel up to the lake stage elevations determined by the reservation line for these lakes set forth in the proposed rule. This reservation line is technically and legally incorrect for the following reasons:

No Discussion Correlating Protection of Fish and Wildlife and Specific Reservation Hydrographs

The Technical report provides no discussion specifically correlating the water reservation hydrograph of Figure 21 with water needed for the "protection of fish and wildlife." In other words, the Technical Report gives no analysis of why this particular hydrograph is needed to protect the identified fish and wildlife.

Failure to Employ Site-Specific or Current Data

In establishing this reservation line, the District chose not to use site-specific data or the most current data the District knows are available for these lakes. These site-specific data include elevation transects, surface water modeling developed by Donald W. McIntosh Associates, Inc., data used to determine the ordinary high water line for these lakes, and species surveys. By choosing to ignore these site-specific and current data, the District is making an arbitrary and capricious decision regarding the reservation water level for these lakes. Some examples of this are the following:

- On page 23, the Technical Report fails to mention that the Disston Canal connects Lake Mary Jane to the Econlockhatchee River which affects the hydrographs of Lake Mary Jane.

- On pages 64-65, the Technical Report does not use the best available data for the analysis described. Specifically –
    - The report uses 2004-2007 vegetation or land cover maps. This dataset is out of date. The District has a 2008-2009 land use land cover dataset released in 2011 based on 2008-2009 aerial photography, yet the District chose not to use this more recent dataset.
    - The District completed littoral vegetation mapping efforts on the majority of the Kissimmee Chain of Lakes (KCOL) including Lakes Myrtle, Preston and Joel

which was published in 2011 and is based on 2009 aerial photography and ground-truthing. However, the District chose not to use these more recent and more accurate data.

- A specific bathymetric survey of Lakes Myrtle, Preston and Joel was conducted in 2010-2011 through a partnership between Florida Fish and Wildlife Conservation Commission (FWC) and the District. Instead of using this recent specific bathymetric survey, the District chose to use less accurate, non-site-specific data, including a 1950s U.S. Geological Survey (USGS) bathymetry.

- On page 66, Table 10, the Technical Report lists hydroperiods in days per year, but these data are not included in the cited 1999 FDOT report or the District Photointerpretation Classification Key. Thus, the source of these values is unspecified and unclear. As such, these values cannot be verified.

- On page 67 of the Technical Report, Table 11 indicates 50% of Lakes Myrtle, Preston and Joel are comprised of littoral vegetation. FRI believes this value is inaccurate and requests the District provide evidence to support this value. Additionally, Table 11 notes that 364 acres of wetland shrub are below 62.0 feet NGVD29, comprising the second largest Wetland Class behind Marsh. However, in Figure 10 of the Technical Report, only a very limited portion of the wetland shrub occurs below elevation 62.0 feet NGVD29. This discrepancy suggests either Table 11 or Figure 10 is inaccurate. Finally, Table 11 notes that 82 acres of wet prairie is below 62.0 feet NGVD29, however, in Figure 10, the entire wet prairie appears above elevation 62.5 feet NGVD29. This discrepancy also suggests either Table 11 or Figure 10 is inaccurate.

- On page 68, Figure 10 of the Technical Report, it is unclear why the District graphed wetland vegetation 4 feet above the regulated high stage of 62.0 feet in Lakes Myrtle, Preston and Joel when Box 2 on page 65 indicates the District clipped the land use/land cover maps "to encompass only the area 1 foot above and below high pool within each explicit reservation lake." Additionally, the vegetation described in Figure 10 is inconsistent with site-specific transect data Breedlove, Dennis & Associates, Inc. provided to District staff, which data have apparently been ignored. Finally, on page 72, the Technical Report indicates these plant community elevation ranges are consistent with those measured in the field by Dr. John Zahina, but Dr. Zahina's data has not been published. Dr. Zahina's data should be included as an appendix to the Technical Report, allowing the data to be verified by affected stakeholders.

- On page 74, the Technical Report states that there has been no fish survey of Lakes Myrtle, Preston and Joel conducted by the FWC, and so the Technical Report assumes

that the 26 species identified in other Kissimmee Basin lakes "are likely to occur in the Lakes Myrtle-Preston-Joel reservation waterbody as well." The Technical Report's statement about lack of a FWC survey is inaccurate. FWC conducted largemouth bass surveys of Lakes Myrtle, Preston and Joel on April 24-26, 2012 in which 10 species of fish were identified, and on April 24, 25, and May 3, 2013 in which 14 species of fish were identified. The Technical Report should be revised to delete this inaccurate statement and to incorporate the data from these FWC surveys.

- On page 80, the Technical Report neglects to indicate that the FWC surveyed alligators in Lakes Myrtle, Preston and Joel on May 17, 2011.

- On page 81, the Technical Report identifies the wood stork as an endangered species. This is incorrect as the wood stork was reclassified in 2014 to a threatened species. The Technical Report should be revised to reflect the reclassification. Table 17 of the Technical Report should also be revised to reflect this new listing status.

- On page 90 of the Technical Report, it is unclear how the UKISS model was used in developing the Headwaters Revitalization Schedule. If the UKISS model was used to set the reservation schedule, it is unclear whether the UKISS model properly accounted for flow from the Lake Conlin basin to Lakes Myrtle, Preston and Joel. Representatives of FRI have discussed this flow with Mr. Kenneth Konyha of the District. On page 92 of the Technical Report, it seems to indicate the District used the KBMOS model to develop the reservation schedule. If the KBMOS model was used, that model does not appear to have been updated to include the recent site specific data developed by Breedlove, Denis & Associates and Donald W. McIntosh Associates, Inc., for Lakes Preston, Joel, Myrtle and Conlin, as well as the Econlockhatchee and Cat Island Swamps, which has been provided to the District. The Technical Report should be revised to clarify which model is used and update the appropriate model to incorporate the best data available. Additionally, neither the UKISS model nor the KBMOS model appears to have addressed the under-sized S-57 structure.

- On page 97 of the Technical Report, it appears the hydrologic requirements of the existing fish and wildlife resources were primarily based on the current U.S. Army Corps of Engineers (ACOE) stage regulation schedule rather than scientific based research of specific target species for Lakes Myrtle, Preston and Joel. The District should employ a scientific basis for its reservation level including employing the previously surveyed site-specific cross-sections of these lakes which would provide a more accurate basis of assessment than the general ACOE regulation schedule.

- On page 97 of the Technical Report, the text indicates that step 5 of the process includes "adjusting the reservation hydrograph to meet specific hydrologic requirements of fish and wildlife in individual reservation waterbodies, if required." However, in contrast to this general statement, it appears the reservation hydrograph for Lakes Myrtle, Preston and Joel was not adjusted because the Technical Report does not describe how the hydrologic requirements of site-specific species identified in Lakes Myrtle, Preston and Joel were considered in the District's analysis.

- On page 100 of the Technical Report, the text states "[t]he current stage regulation schedules constrain the maximum water level in these lakes for the protection of public health and safety." However, a review of the District's data indicates that Lakes Myrtle, Preston and Joel are frequently flooded to a greater extent and for a longer duration than the other lakes within the Upper Kissimmee Basin of the KCOL, and this has resulted in flooding of private lands on several occasions for prolonged periods of time. The Technical Report neglects to address this issue. Thus, it is unclear how the District intends to balance flood protection with protection of fish and wildlife.

- On pages 100-103, Figures 21-26 of the Technical Report, the District needs to identify the specific need for additional water by fish and wildlife from October to November in all KCOL reservation waterbodies as this appears to be outside the spawning period of all the fish species listed in Table 13 with the exception of the bowfin which spawns all year long. Additionally, these increased water levels are not needed for the hydrologic requirement of alligators, which hatch by mid-September according to the description on page 80 of the Technical Report.

Reservation Level Is Set above the Historic Ordinary High Water Line and Reserves Water Beyond that Needed for Fish and Wildlife Protection and which will Continuously Flood Privately Owned Land

On page 21, the Technical Report states that "[t]he regulated high stage was used to define the boundaries of the reservation waterbodies to protect and maintain the wetland habitat utilized by fish and wildlife." Table 3 of the Technical Report indicates the regulated high stage is 62.0 feet NGVD29 for Lakes Myrtle, Preston and Joel based on the Army Corps of Engineers regulation schedule. As the District is aware, a court ordered Final Judgement to Quiet Title rendered May 22, 2009, clearly states the following:

> "...the State of Florida shall have no claim of title as to any and all lands lying in Township 25 South, Range 32 East and Township 25 South, Range 31 East, Osceola County, Florida, at or above 60.5 NAVD88 lying landward of Lake Myrtle, Lake Preston and Lake Joel as depicted in the attached aerial photograph, prepared by Division Staff

and dated April 22, 2009, which graphically represents the 60.5 foot elevation in relation to Lake Myrtle, Lake Preston and Lake Joel."

In this geographic area, 60.5 feet NAVD88 ≈61.5 feet NGVD29. Therefore, the proposed rule sets the reservation water level at an elevation that will result in the outer boundary extending 0.5 feet landward of the established ordinary high water line for these lakes. As such, the District proposes to reserve water in these lakes at levels beyond that needed to protect fish and wildlife, and, instead at levels that will lead to regular and periodic flooding of privately owned land. By definition, water above the historic ordinary high water line cannot be needed to protect fish and wildlife. Thus, the proposed rule is arbitrary and capricious. Additionally, the adoption of the currently proposed reservation water level for Lakes Myrtle, Preston and Joel may lead to an unconstitutional taking of private property.

Reservation Level for Contributing Surface Waters to Lakes Myrtle, Preston and Joel Not Set Using Site Specific or Current Data

Since the reservation level for the contributing surface waters to Lakes Myrtle, Preston and Joel is based upon the reservation level for these lakes, the reservation level for these contributing surface waters is technically flawed and arbitrary and capricious for the same reasons identified above for these lakes.

Clarify Surficial Aquifer Reservation

The draft rule reserves groundwater in the surficial aquifer system contributing to Lakes Myrtle, Preston and Joel. (See proposed rule 40E-10.071 lines 62-65.) The draft rule states that water pumped from the surficial aquifer system that imposes a 0.1 foot or greater drawdown at the landward edge of the reservation waterbody is considered "indirect withdrawals of groundwater." (See proposed rule Applicant's Handbook lines 21-24.) The draft rule states that surficial aquifer system withdrawals that "impose no more than 0.5-foot of drawdown [as determined by existing rule language] individually and cumulatively at the landward edge of the reservation waterbodies" do not use reserved water. (See proposed rule Applicant's Handbook lines 126-130.)

We believe this language creates confusion about the use of the 0.1 foot or 0.5 foot drawdown parameters in the above referenced draft rule language. Is the District's intent to subject surficial aquifer withdrawals causing 0.1 foot of drawdown to the reservation rule criteria, but deem that criteria satisfied if the drawdown is not greater than 0.5 feet? FRI suggests that the District clarify the above reference rule language regarding the 0.1 foot and 0.5 foot drawdown.

Additionally, as explained above, the reservation water level proposed for Lakes Myrtle, Preston and Joel extends beyond the landward edge of these lakes. Thus, for these lakes, the surficial aquifer drawdown (whether 0.1 or 0.5 feet) for determining compliance with the rule will extend

inside of the outer boundary of the reservation line, an outcome it seems likely the District does not intend.

Thank you for considering these comments. We look forward to working with District staff to address FRI's concerns identified herein and in FRI's January 14, 2015, letter. If you have any questions regarding this letter, please contact me.

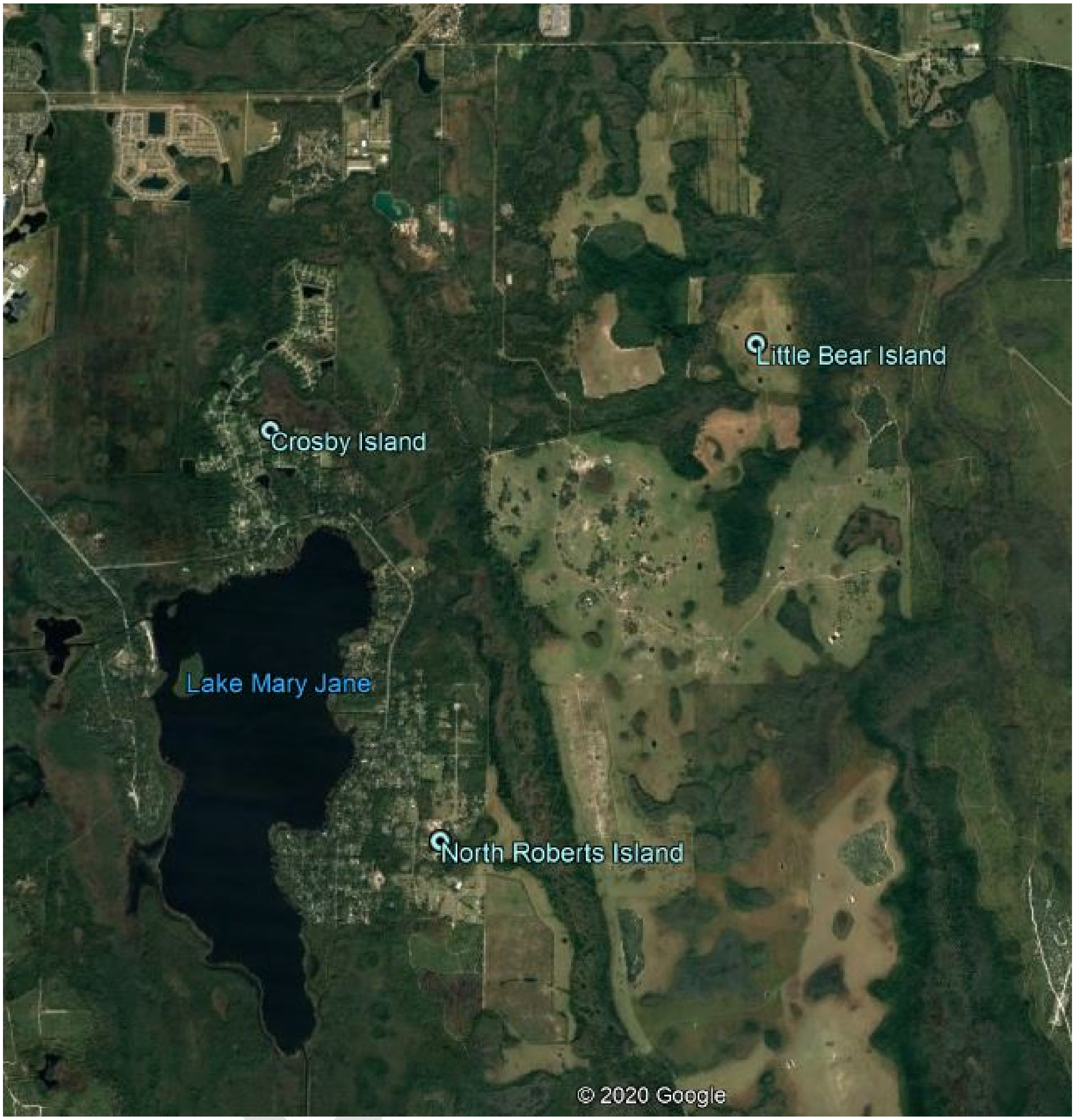
Sincerely,

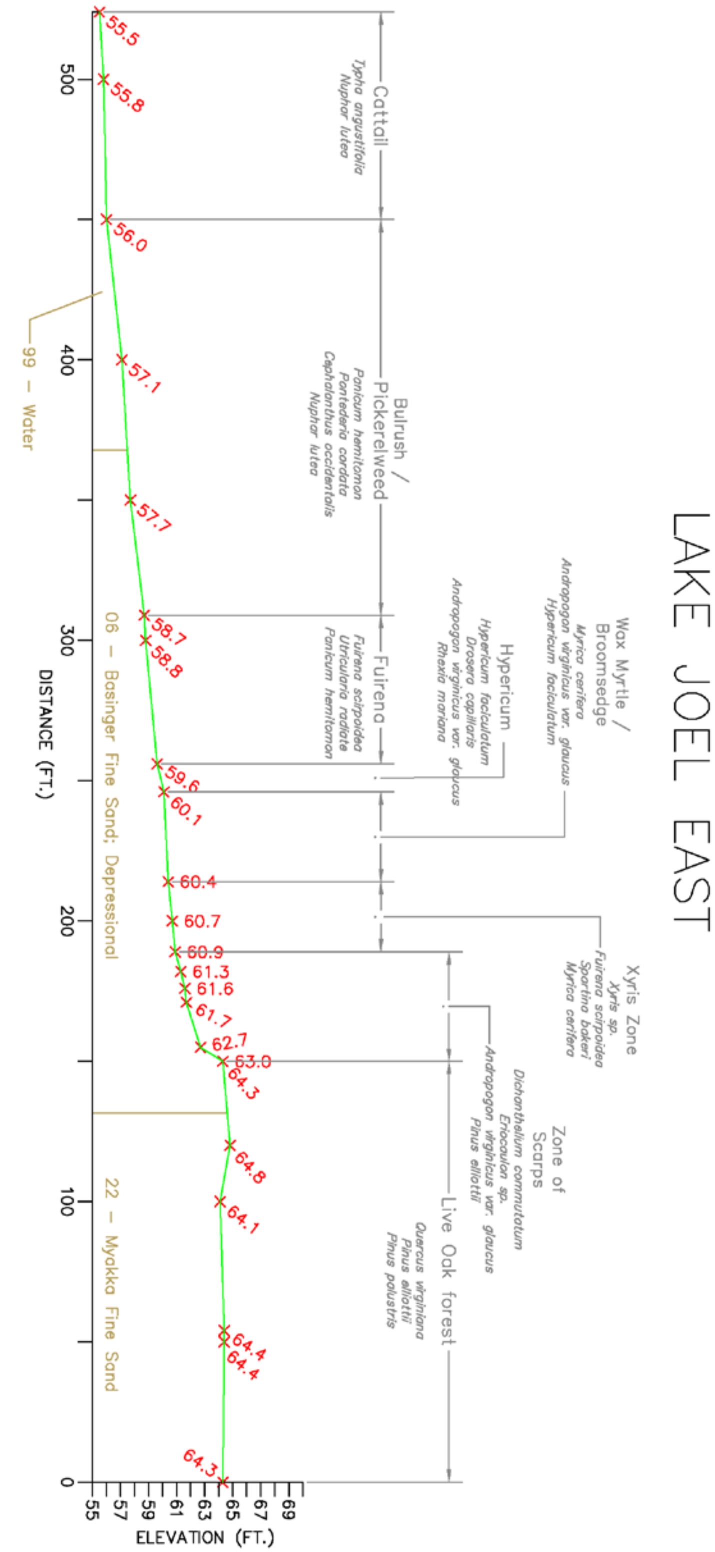
Signature Redacted

By: ____________________

Eric T. Olsen., Esq.
Hopping Green & Sams, P.A.
Attorneys for Farmland Reserve, Inc.

cc: David Wright


Little Bear Island
Crosby Island
Lake Mary Jane
North Roberts Island
© 2020 Google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Nuphar lutea
Fuirena
Fuirena scirpoidea
Utricularia radiata
Panicum hemitomon
Hypericum
Hypericum fasciculatum
Drosera capillaris
Andropogon virginicus var. glaucus
Rhexia mariana
Wax Myrtle / Broomsedge
Myrica cerifera
Andropogon virginicus var. glaucus
Hypericum fasciculatum
Xyris Zone
Xyris sp.
Fuirena scirpoidea
Spartina bakeri
Myrica cerifera
Zone of Scarps
Dichanthelium commutatum
Eriocaulon sp.
Andropogon virginicus var. glaucus
Pinus elliottii
Live Oak forest
Quercus virginiana
Pinus elliottii
Pinus palustris
99 – Water
06 – Basinger Fine Sand; Depressional
22 – Myakka Fine Sand
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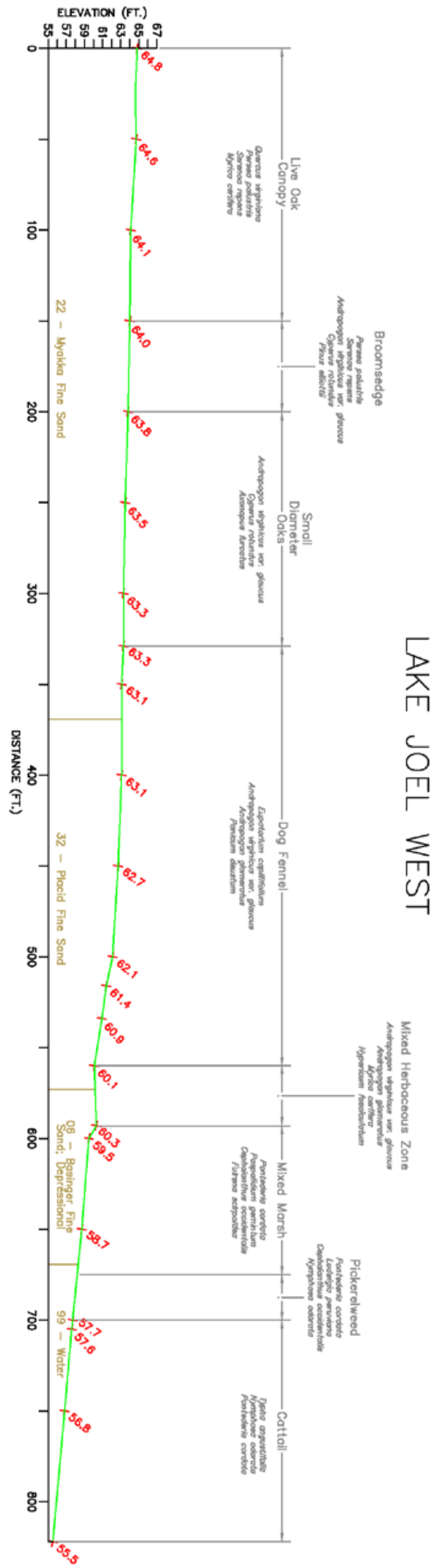
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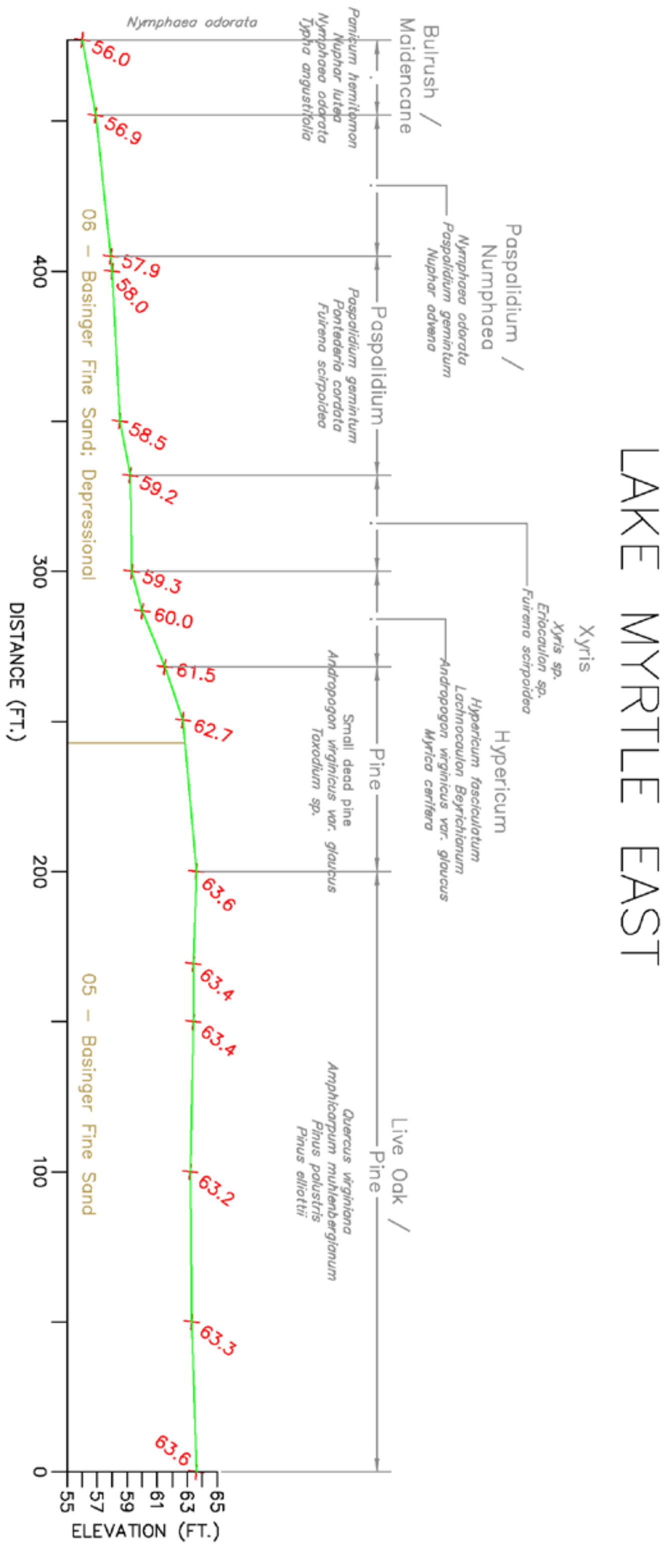
Pickerelweed
Cattail
22 – Myakka Fine Sand
32 – Placid Fine Sand
08 – Basinger Fine Sand; Depressional
99 – Water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Nymphaea odorata
Paspalidium geminatum
Nuphar advena
Paspalidium
Paspalidium geminatum
Pontederia cordata
Fuirena scirpoidea
Xyris
Xyris sp.
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Hypericum
Hypericum fasciculatum
Lachnocaulon Beyrichianum
Andropogon virginicus var. glaucus
Myrica cerifera
Pine
Small dead pine
Andropogon virginicus var. glaucus
Taxodium sp.
Live Oak / Pine
Quercus virginiana
Amphicarpum muhlenbergianum
Pinus palustris
Pinus elliottii
06 – Basinger Fine Sand; Depressional
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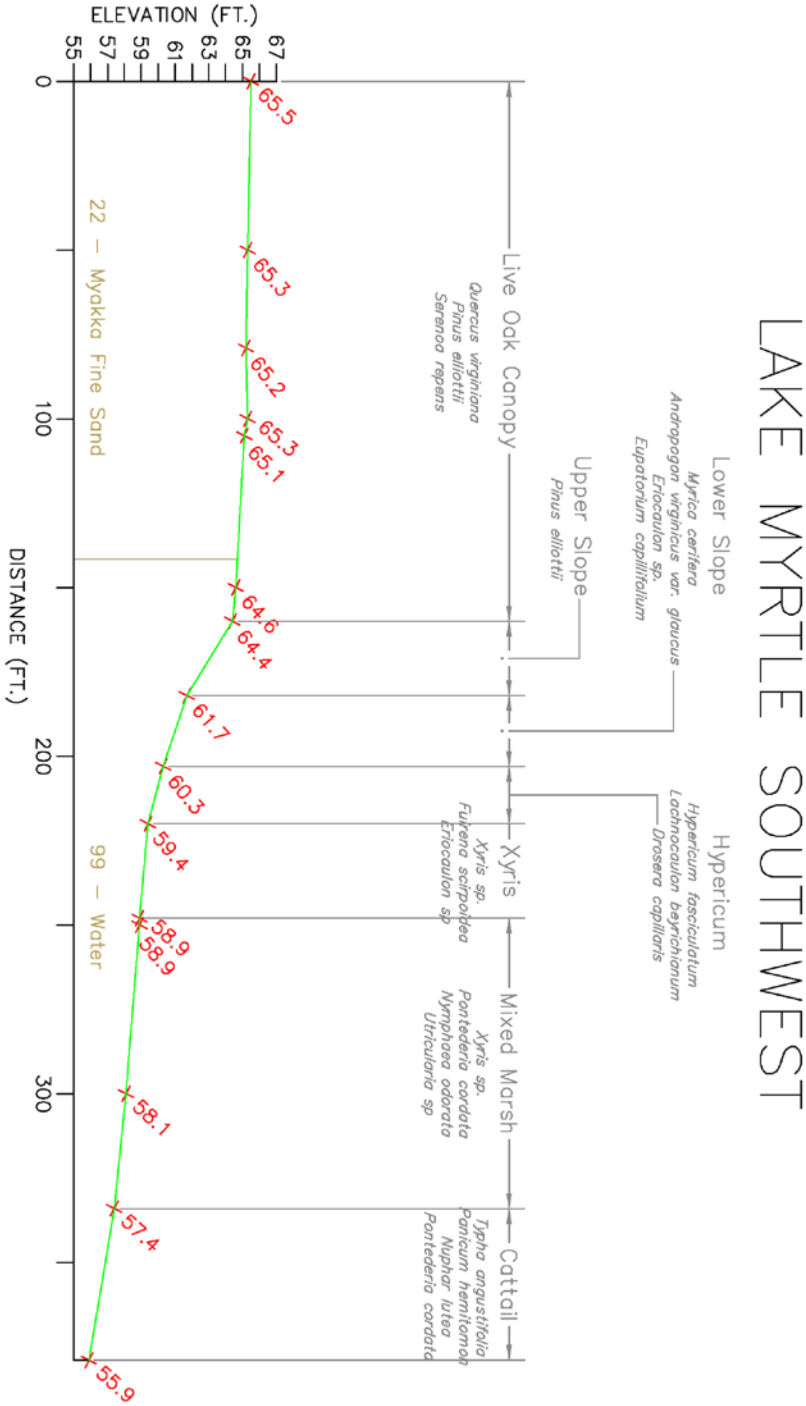
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Upper Slope
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Lower Slope
Myrica cerifera
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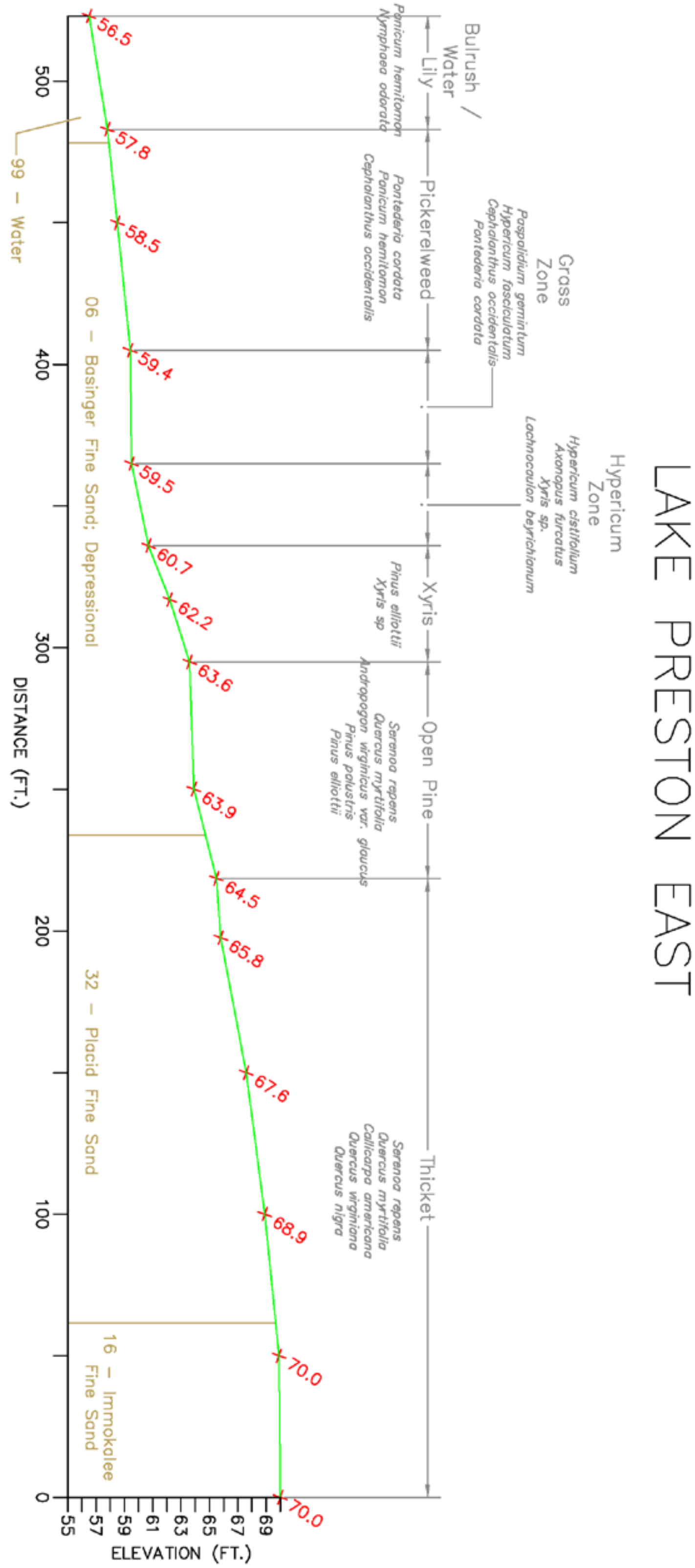
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Cephalanthus occidentalis
Grass Zone
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Hypericum fasciculatum
Cephalanthus occidentalis
Pontederia cordata
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Axonopus furcatus
Xyris sp.
Lachnocaulon beyrichianum
Xyris
Pinus elliottii
Xyris sp
Open Pine
Serenoa repens
Quercus myrtifolia
Andropogon virginicus var. glaucus
Pinus palustris
Pinus elliottii
Thicket
Serenoa repens
Quercus myrtifolia
Callicarpa americana
Quercus virginiana
Quercus nigra
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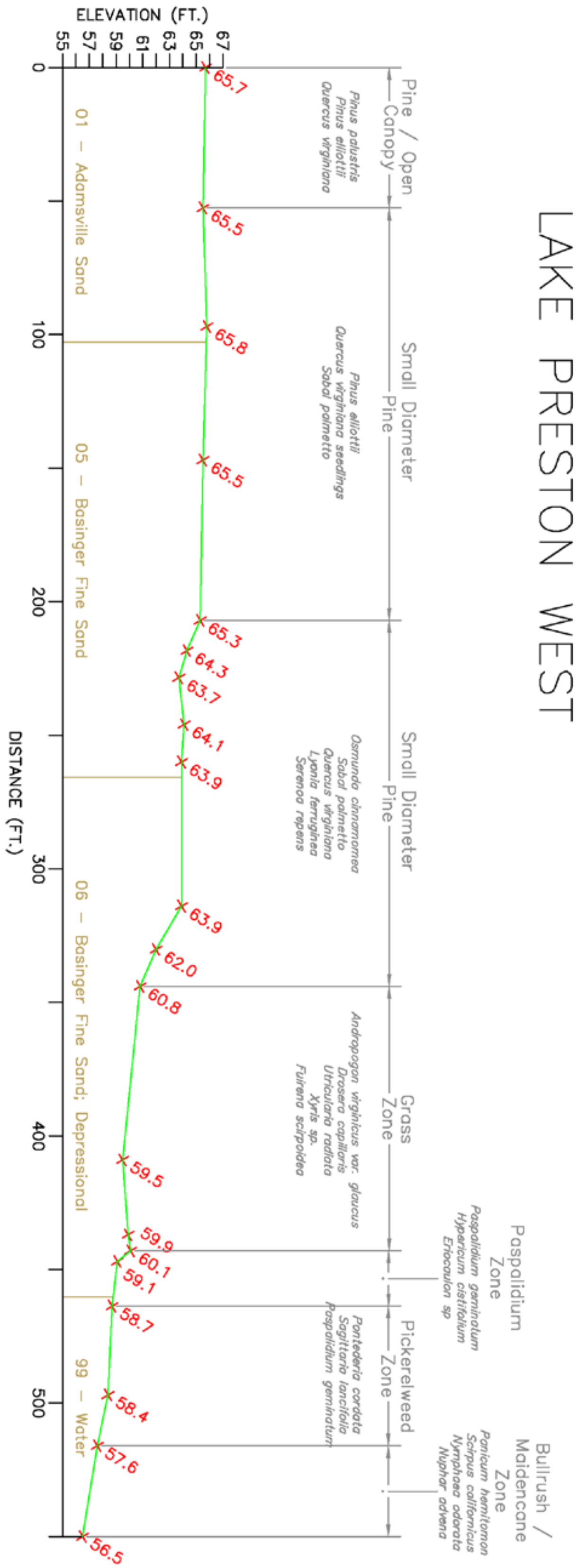
LAKE PRESTON WEST
ELEVATION (FT.)
DISTANCE (FT.)
Pine / Open Canopy
Pinus palustris
Pinus elliottii
Quercus virginiana
Small Diameter Pine
Pinus elliottii
Quercus virginiana seedlings
Sabal palmetto
Small Diameter Pine
Osmunda cinnamomea
Sabal palmetto
Quercus virginiana
Lyonia ferruginea
Serenoa repens
Grass Zone
Andropogon virginicus var. glaucus
Drosera capillaris
Utricularia radiata
Xyris sp.
Fuirena scirpoidea
Paspalidium Zone
Paspalidium geminatum
Hypericum cistifolium
Eriocaulon sp
Pickerelweed Zone
Pontederia cordata
Sagittaria lancifolia
Paspalidium geminatum
Bullrush / Maidencane Zone
Panicum hemitomon
Scirpus californicus
Nymphaea odorata
Nuphar advena
01 – Adamsville Sand
05 – Basinger Fine Sand
06 – Basinger Fine Sand; Depressional
99 – Water
65.7
65.5
65.8
65.5
65.3
64.3
63.7
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63.9
63.9
62.0
60.8
59.5
59.9
60.1
59.1
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58.4
57.6
56.5

Source: USGS DOQQ (NW NE SW SE Quarter Quad); LABINS, MrSID; Flight date, 2004.

BDA BREEDLOVE, DENNIS & ASSOCIATES, INC.
330 W. Canton Ave., Winter Park, FL 32789 P: 407-677-1882 F: 407-657-7008

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ArcGIS\Sungrove*.mxd
Plots\...\Sungrove_Transects_Aerial_A.pdf

. LAKE TRANSECTS

Everglades Coalition

May 18, 2020

Toni Edwards
South Florida Water Management District
P.O. Box 24680
West Palm Beach, FL 33406

Sent Via Email: tedwards@sfwmd.gov

Re: Water Reservation Rules for the Kissimmee River and Chain of Lakes

Dear Ms. Edwards:

The 61 member organizations of the Everglades Coalition, representing local, state, and national conservation and environmental organizations dedicated to restoring America's Everglades, write in support of the adoption of water reservation rules for the Kissimmee River and Chain of Lakes currently being considered by the South Florida Water Management District (District). The water reservation is critical to the success of the Kissimmee River Restoration Project (KRRP) which was undertaken through a 50-50 partnership between the District and the United States Army Corps of Engineers (Corps).

The Kissimmee River once meandered for 103 miles through central Florida before emptying into Lake Okeechobee. Seasonal rains would inundate the two-mile-wide river floodplain creating a rich and diverse wetland ecosystem that provided critical habitat for wading birds, fish and wildlife. However, between 1962 and 1971, the Corps dredged and straightened the Kissimmee River into the canal we now know as the C-38 canal in what was quickly recognized as a misguided effort to drain central Florida. The channelization project drained most of the river floodplain and cut off flow to the historic river channel resulting in devastating impacts to the floodplain ecosystem and the native fish and wildlife it supported. The loss of surface water storage in the adjacent floodplain and the lowering of the Kissimmee Chain of Lakes decreased regional water storage capacity and accelerated the conveyance of water to Lake Okeechobee spawning a host of adverse consequences including high-water harm to the Lake and Northern Estuaries, nutrient pollution, harmful algal blooms, and following massive and wasteful water releases, increased water shortage problems.

Committed to full protection and restoration of America's Everglades

450 N. Park Road # 301, Hollywood FL 33021 | www.evergladescoalition.org | info@evergladescoalition.org

In recognition of the significant environmental harm caused by channelizing the Kissimmee River, the Corps and the District commenced a phased restoration of the river's historic meandering path in 1999. The final phases of the project are scheduled to be completed in 2020 and restore over 40 square miles of the river's floodplain ecosystem, including over 25,000 acres of wetlands which will once again provide critical habitat for birds, fish and wildlife. The Headwaters Revitalization Project will allow the maximum water levels of Lakes Kissimmee, Cypress and Hatchinehaw to raise an additional 18 inches each year, reflooding about 20,000 acres of drained lake marshes. In all, the project will increase water storage capacity north of Lake Okeechobee by about 100,000acre feet.

In order to protect the public's significant investment in and ensure the success of the KRRP, a sufficient quantity of water must be set aside to restore an appropriate hydrological regime for the protection of fish and wildlife. The District has the authority to do so under state law and when so reserved water for this purpose will protect the project from water shortages due to consumptive uses.[1] When finalized, the water reservation rules will be incorporated into the District's consumptive water use permitting program.

The District has attempted on two other occasions to adopt a water reservation for the KRRP, but each effort fell short. The first attempt at rulemaking was initiated in 2008. The District developed a draft technical document which was approved by a peer review panel, but the rulemaking process was suspended. Rulemaking was reinitiated in 2014, but after development of a new technical document and public workshops, rulemaking again was suspended in 2016.

The current rulemaking initiative began in 2018 and is anticipated to conclude in 2020. An updated technical document has been developed, using new hydrologic models to calculate water needs, and the District has held workshops and provided opportunities for public participation. The contributing waterbodies for the proposed water reservation include the Upper Chain of Lakes[2], the Headwaters Revitalization Lakes[3] and the Kissimmee River[4]. The modeling in the technical document has been approved by a peer review panel. New and revised rules have been prepared which will become part of the District's permitting program.

At cost of over $800 million dollars, the Kissimmee River Restoration Project is an important component of South Florida's environmental future, but in order to reap the full return on this investment, the District must act to approve and adopt the water reservation. We urge the District to finalize the rulemaking process and adopt the water reservation to ensure the success of this decades long project.

Sincerely,

Signature Redacted | Signature Redacted

Mark Perry, Co-Chair | Marisa Carrozzo, Co-Chair

[1] 373.223(4) F.S.
[2] Lakes Hart-Mary Jane, Lakes Myrtle-Preston-Joel, Alligator Chain of Lakes, Lake Gentry, Lake Tohopekaliga, East Lake Tohopekaliga, and associated canals.
[3] Lakes Kissimmee, Cypress, Hatchineha, and Tiger, and associated canals.
[4] To S-65E structure north of Lake Okeechobee; includes Istokpoga Canal and floodplain, C-38 Canal, and remnant river channels from S-65 to S-65E.

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Toho Water Authority

bringing you life's most precious resource

951 Martin Luther King Blvd., Kissimmee, FL 34741
Tel: 407-944-5000
www.tohowater.com

May 18, 2020

VIA EMAIL
tedwards@sfwmd.com

Mrs. Toni Edwards, Senior Scientist
Coastal Ecosystems Section
South Florida Water Management District
P.O. Box 24680
West Palm Beach, FL 33406

Re: Comments on draft Kissimmee Basin Water Reservation Rule, Sections to the Applicant's Handbook, and Technical Documents

Dear Mrs. Edwards,

The Toho Water Authority (TWA) appreciates the opportunity to review and comment on the draft Kissimmee Basin Water Reservation (KBWR), including draft changes to Chapter 40E-10, Florida Administrative Code (F.A.C.), pertinent draft sections of the *Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District*, and a draft report titled, *Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes*.

By separate letter issued on May 15, 2020, TWA has submitted comments to you as part of the STOPR Group. However, we take this opportunity to provide you additional detail with regard to several of the proposed changes mentioned in the STOPR letter, since they directly adversely affect TWA's permit and existing legal uses.

As you are aware TWA is an existing permitted user of surface water from Mills Slough and East City Ditch, contributing water bodies to Lake Tohopekaliga, under South Florida Water Management District (District) water use permit (WUP) 49-02549-W for the Lake Toho Restoration/Alternative Water Supply (AWS) Project. This project is listed in both the Final 2015 and draft 2020 Central Florida Water Initiative Regional Water Supply Plans.

Our review indicates that the draft KBWR rule will, at minimum, have a substantial adverse effect on this already-permitted, under construction, critical water supply project and may well render the project infeasible. TWA and our project partner, Osceola County, have invested significant

capital expenditures to develop this AWS project to meet future water supply needs within our service area.

More than simply an AWS project, the reservoir for Toho's AWS project reflects a collaborative approach that integrates water supply planning, water quality improvements, and economic development for the region. The reservoir serves as an integral component of the Osceola County's NeoCity High-tech Innovation corridor, which has been supported by Florida Department of Economic Opportunity grants. The siting of an urban reservoir highlights the opportunity for successful integrated water resources and land use planning. The impacts of the draft KBWR rule adversely affect not only the investments made by TWA, but Osceola County and the State of Florida as part of the NeoCity project.

Limiting condition 6 and Exhibit 6 of TWA's WUP contain a surface water withdrawal operating protocol that only allows TWA to withdraw surface water from Mills Slough and East City Ditch when the stage in Lake Tohopekaliga is above the water level schedule contained in Exhibit 6. The proposed draft water reservation line for Lake Tohopekaliga contained in Appendix 4 of proposed rule 40E-10 is lower than the water level schedule contained in Exhibit 6 of TWA's WUP for almost the first seven months of the year. We understand from the KBWR technical documents, and based on recent stage data for the lake, that the District intends to operate the stage of the lake close to the proposed water reservation line. This operating protocol will result in the stage of the lake frequently being below TWA's permitted water level schedule, potentially precluding TWA from making permitted withdrawals from the lake for over half the year. This will significantly impact the viability of implementing this critical project.

Based on this critical concern, TWA respectfully submits the below changes to Subsection 3.11.5.A of the draft sections of the *Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District.*:

- Insert a new Number 3 that states, "Withdrawals of any type pursuant to allocations (total annual and maximum monthly) set forth in permits involving a direct withdrawal of surface water or an indirect withdrawal of groundwater issued prior to _______________[insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5]."

- Renumber existing Number 3 as 4 and change the text as follows: "A permit modification, transfer, reallocation or renewal of a permit issued before (in the case of a withdrawal subject to subparagraph 3) or after (in the case of a withdrawal subject to rule 40E-10 and A.H. 3.11.5) _____________[insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5] involving a direct withdrawal of surface water or an indirect withdrawal of groundwater that: a) does not change the source, increase the allocation, or change the withdrawal location (e.g., replacement of an existing well or surface water pump with similar construction and at a similar location); b) results from ~~in~~ crop changes that do not change the allocation or timing of use; or c) ~~a~~ decreases the permit ~~in~~ allocation."

- Insert a new Number 5 that states, "If the stage operating schedule of a permit issued prior to ___________________[insert the effective date of rules 40E-10.021(7), 40E-10.031(6), and 40E-10.071 and A.H. 3.11.5] is more restrictive than the surface water reservation stage set forth in Appendix 4 of Rule 40E-10.071, upon the request of the permittee, the District shall conform the schedule in the permit to that of the rule, so long as the modification does not increase the total annual and maximum monthly allocation in the permit.

We request these changes be included in the proposed rule because we believe the rule is not clear as written and because it will cause great harm to TWA's project without relief. The first two changes proposed are, to our understanding, consistent with the explanations provided during the rule workshops as to how the District will treat existing permits. The last change proposed is intended to address the situation affecting the WUP (which might also affect other permitted users who may have a schedule more stringent than that in the rule).

If the water level schedule in TWA's permit is conformed to the proposed water reservation line before or after the rule is adopted, with no additional constraints or changes in allocation, the Lake Toho Restoration/AWS Project will not be adversely impacted by the District's operation of the lake.

We request a conference with the District as soon as possible to discuss this critical matter and a solution that is workable to TWA and the District.

If you have any questions, please feel free to contact me.

Signature Redacted

Digitally signed by Todd Swingle
Date: 2020.05.18 15:23:57 -04'00'

Todd P. Swingle, P.E.
Executive Director
Toho Water Authority

cc: Nicholas Vitani
Simon Sunderland
Jennifer Brown
Lawrence Glenn

May 18, 2020

SENT VIA ELECTRONIC MAIL

Ms. Toni Edwards
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33406
Email: tedwards@sfwmd.gov

RE: Suburban Land Reserve, Inc./Tavistock East Holdings, LLC/Tavistock East Services, LLC Comments on Proposed Kissimmee River Basin Water Reservation Rules

Dear Ms. Edwards:

Suburban Land Reserve Inc, a Utah corporation ("SLR"), Tavistock East Holdings LLC a Florida limited liability company, and Tavistock East Services, LLC a Florida limited liability company (together "Tavistock" and collectively with SLR "Owners") are parties to that certain Memorandum of Master Development and Purchase Agreement ("MDPA") recorded 8/31/2015 in the Orange County public records. Pursuant to the MDPA, the Owners currently own or have the right to purchase the fee simple title to certain real property comprising approximately 19,000 acres in Osceola County known as the Northeast District ("Property). Owners are currently developing the Property as a large-scale master planned community including residential, office, industrial, retail and hotel uses. This project is known as Sunbridge and numerous South Florida Water Management District (SFWMD) permits have already been issued on portions of the Property for which work has, is or is about to occur.

SLR/Tavistock's substantial interests are affected by the proposed Kissimmee River Basin Water Reservation rule draft dated April 6, 2020 and the accompanying draft Technical Document to Support Water Reservations for the Kissimmee River and Chain of Lakes draft report April 2020 (Technical Report). Consequently, SLR/Tavistock submits the following comments regarding the proposed Rule.

SLR/Tavistock Substantially Affected by Proposed Kissimmee Water Reservation Rule

Tavistock owns or has a beneficial interest in approximately 19,000 acres of land in Osceola County. On this land, Tavistock is developing a large scale mixed use project known as Sunbridge. To facilitate

construction of this project, Tavistock will have to withdraw water from the surficial aquifer system to dewater that system. In addition, pursuant to various agreements with the Tohopekaliga Water Authority, Tavistock or its affiliated corporate entities is required to provide irrigation water for Sunbridge. One source of this irrigation water could be use of the surficial aquifer system.

Tavistock will need to obtain water use permits from the District to withdraw water from the surficial aquifer system for dewatering and potential irrigation purposes. The ability to obtain such water use permits will be affected by the proposed Kissimmee Basin Water Reservation Rule.

The Sunbridge Development is located in the same surface water basin and within close proximity to Lakes Myrtle, Preston, Joel, Mary Jane and Hart. Due to the proposed rule's potential limitations on the use of the surficial aquifer in the vicinity of these lakes, Tavistock is substantially affected by this proposed rule.

Potential Effect on Dewatering of Surficial Aquifer System Needs Clarification

The proposed rule would prohibit the withdrawal of water from the surficial aquifer system via a well if such withdrawal would cause a 0.1 foot or more surficial aquifer drawdown at the landward edge of the reservation waterbody. Tavistock's dewatering operations to support construction at the Sunbridge development could cause a 0.1 foot or more surficial aquifer drawdown at the landward edge of Lakes Myrtle, Preston, Joel, Mary Jane and Hart.

The District's existing water use permitting rules governing dewatering provide that for dewatering operations, water reserved in chapter 40E-10 is deemed not to be withdrawn if the dewater water is retained "onsite" (see Water Use Permit Applicant's Handbook section 2.3.2 B. 2.) or "on the project site" (see rule 40E-2.061(2)(a)2. F.A.C.). However, the phases "onsite" and "on the project site" are not defined in the District's existing water use permitting rules. Nor are these phases defined in the proposed Kissimmee Basin Water Reservation Rule.

The District should include in its revisions to its Water Use Permit Applicant's Handbook a definition of the phases "onsite" or "on the project site" for purposes of determining when water withdrawn for dewatering purposes does not involve the withdraw of reserved water under chapter 40E-10, F.A.C.

Similarly, the District should add language to its Kissimmee Basin Water Reservation rule cross referencing the existing District water use permitting provisions governing dewatering to clarify that when dewatering water is retained onsite or on the project site, the withdrawal of such water is deemed not to involve the use

Ms. Toni Edwards
May 18, 2020
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of reserved water, even when such water withdraw causes a 0.1 foot or more surficial aquifer drawdown at the landward edge of a Upper Chain of Lakes reservation waterbody.

Surficial Aquifer Drawdown Limitation Unworkable in Practice

The District's proposed water reservation rule for Lakes Myrtle, Preston, Joel, Mary Jane and Hart reserves from use withdrawals of water from the surficial aquifer via a well that cause a 0.1 foot or more drawdown in the surficial aquifer at the landward edge of Lake Myrtle, Lake Preston, Lake Joel, Myrtle/Preston Canal, and the Central and Southern Florida Flood Control Project canals that occur between the S-57 and S-58 structures in Osceola County. The proposed rule does not define the term "landward edge." This term should be defined so that regulated entities can clearly locate the landward edge of these waterbodies to determine compliance with this rule.

How compliance with this surficial aquifer drawdown limitation will be determined is not specified in the proposed rule. Presumably, this will be done by employing a groundwater or groundwater and surface water model to model the extent of drawdown caused by surficial aquifer withdrawals. This approach may be unworkable in practice as 0.1 foot is typically within the margin of error of most groundwater flow models. The District should consider revising this 0.1 foot drawdown standard to a higher number that is within the range of what groundwater flow models can accurately predict.

Proposed Reservation Lake Stage for Lakes Myrtle, Preston and Joel

The MDPA establishes the right for the entities listed above to purchase approximately 19,000 acres which surrounds Lakes Myrtle, Preston and Joel. This right to purchase would include lands around these lakes to the established Ordinary High Water Line (OHWL) elevation of 61.5 feet NGVD29. The Rule proposes a high stage regulation of 62 feet NGVD29, which would be 0.5 feet above the established OHWL. This would flood private land and potentially affect its intended development potential.

The District should change the maximum elevation for the WRL for Lakes Myrtle, Preston and Joel to respect the ordinary high water line elevation of 61.5 NGVD 29. Making this change would allow the proposed rule to be consistent with private property ownership while still protecting fish and wildlife.

Ms. Toni Edwards
May 18, 2020
Page 4

SLR/Tavistock is supportive of the environmental restoration efforts of the District in the Kissimmee Basin and looks forward to working with the District on this rulemaking to accomplish responsible restoration efforts, while protecting water and land use rights of landowners. We are available to discuss these comments if the District so desires.

Respectfully Submitted,

Signature Redacted

James L. Zboril
President
Tavistock East Holdings, LLC
Tavistock East Services, LLC

Southport Ranch, LLC
P.O. Box 422312
Kissimmee, FL
34742

June 26, 2020

Don Medellin
South Florida Water Management
District
3301 Gun Club Road
West Palm Beach, FL
33406

Re: June 9' 2020 – Kissimmee Reservation - Rulemaking

Mr. Medellin,

I was a participant for a portion of the aforementioned meeting on June 9th, however I lost internet connection as the result of work on the cell tower. As a result, I only got to attend a portion of the meeting. During the portion of the meeting that I was involved I did not hear any reference to the storm event levels that have historically been utilized in evaluating water control initiatives.

As an impacted property owner it is necessary to determine the efforts that are being undertaken by the SFWMD and the adverse impact to the Southport Ranch property.

Could you please advise the intended impact to the water levels for the areas located south of Lake Tohopekaliga.

Sincerely,

Signature Redacted

Gary L. Lee
Manager
Southport Ranch, LLC

Southport Ranch, LLC
P.O. Box 422312
Kissimmee, FL 34742

July 24, 2020

Camille Carroll
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL
33406

Re: Email communication dated 7/22/2020 E-MAIL ATTACHED

Ms. Carroll,

This letter is in response to your above referenced email.

In review of your transmittal it appears that the study underway does not consider the historic 10 year, 50 year, 100 year, and 500 year storm event levels as determined by the Army Corps of Engineers. The failure to included the historical references determined and applied within the development process would seem to significantly discredit the basis of the report.

Your email references "observed lake stages from 1972 through 2019", once again references reflects that data utilized within the report is incomplete and could be construed to be manipulated to support a predetermined goal of analysis.

In the mid 1960's the Central and South Florida Flood Control initiated a project that would allow water to be held at the ten year storm event level. In the 1990's South Florida Water Management District enacted a project to hold water at the 50 year storm event levels for that portion of the Kissimmee River Valley Ecosystem north of State Road 60. It is recognized that the area south of Lake Toho may not be within the scope of the "target area", however the area south of Lake Toho is directly impacted by staging and drainage from the area with the "target area".

As a taxpayer and as co-owner of the Southport Canal, Southport Ranch is very concerned with waters that flow across its properties and specifically the qualities of such water. The same concerns of course apply to Reedy Creek and the extensive discharges that occur up stream.

Thank you for your response and I anticipate providing additional comment.

Sincerely,

Signature Redacted

Gary L. Lee
Manager

RE: Kissimmee Water Reservations Letter of June 26 from SouthPort Ranch, LLC

Carroll, Camille <adarbyca@sfwmd.gov>
Wed 7/22/2020 10:56 AM

To: Gary Lee <agrivest@msn.com>
Cc: Edwards, Toni <tedwards@sfwmd.gov>; Medellin, Donald <dmedelli@sfwmd.gov>; Welch, Zach <zwelch@sfwmd.gov>

Hello Gary,

Historical water levels (observed lake stages from 1972-2019) were used to establish the water reservation lines. Specifically, the proportion of time the water reservation lines coincide with the maximum of the regulation schedules, and the stages protected in the breeding season (Jan-March) were directly calculated from historical water levels. However, storm events in particular were only considered by their effect on historical averages or in how often stages may have reached the maximum of the regulation schedule. While historical storm events have caused lake stages to exceed the regulation schedules on many occasions, no water is reserved by the water reservation lines above the regulation schedules at any time of year. In that context, historical lake stages ABOVE the regulation schedules were not directly used to set any particular portion of the reservations. For example, flood control or how often lakes may exceed their regulation schedules are outside the scope of this project.

Hopefully, this response together with our email from July 15 answer your question about the inclusion of the historical storm event levels into current studies. Please let me know if you would like to follow this up with a phone call to discuss further.

Thank you,
Camille

Camille Carroll
South Florida Water Management District
I will be working remotely until further notice. I have access to emails (working hours: M-F, 8-4:30).
I can also be reached at 561-682-6732 or 561-371-1576.

From: Gary Lee [mailto:agrivest@msn.com]
Sent: Wednesday, July 22, 2020 9:40 AM
To: Carroll, Camille <adarbyca@sfwmd.gov>
Cc: Edwards, Toni <tedwards@sfwmd.gov>; Medellin, Donald <dmedelli@sfwmd.gov>; Welch, Zach <zwelch@sfwmd.gov>
Subject: Re: Kissimmee Water Reservations Letter of June 26 from SouthPort Ranch, LLC

[Please remember, this is an external email]

I have been out of town, but I get back late this afternoon.

As I recall the information requested was straightforward and focused towards content of study. Most specifically as to the inclusion of the historical storm event levels into current studies.

Gary Lee

Sent from my iPad

On Jul 21, 2020, at 8:13 AM, Carroll, Camille <adarbyca@sfwmd.gov> wrote:

Hi Toni,

Did you ever hear back from Gary? I contacted him at this email address yesterday, but have yet to hear back.

Camille

Camille Carroll
South Florida Water Management District
I will be working remotely until further notice. I have access to emails (working hours: M-F, 8-4:30).
I can also be reached at 561-682-6732 or 561-371-1576.

From: Edwards, Toni
Sent: Wednesday, July 15, 2020 2:53 PM
To: agrivest@msn.com
Cc: Medellin, Donald <dmedelli@sfwmd.gov>; Carroll, Camille <adarbyca@sfwmd.gov>; Welch, Zach <zwelch@sfwmd.gov>
Subject: Kissimmee Water Reservations Letter of June 26 from SouthPort Ranch, LLC

Gary, thank you for your comment letter of June 26 on the Kissimmee River and Chain of Lakes water reservations. I apologize for not acknowledging it sooner. Due to COVID-19, many of our staff are working from home and receipt of hardcopy mail has been delayed. Don Medellin only received your letter yesterday. We will certainly consider it received by the comment period deadline. I passed it along to our project team today for review, and a response to the issues you raised in your letter is provided below.

You mentioned that you weren't able to attend the entire workshop on June 09. All of the materials from the workshop and other supporting information about the project is on our webpage under the Kissimmee tab at https://www.sfwmd.gov/our-work/water-reservations. Please reach out to me or to anyone on this email with further concerns or questions. I can also be reached on my cell phone at (850) 590-5519 or you may call Don on his cell phone at (561) 358-8819.

Toni Edwards
Senior Scientist
Applied Sciences Bureau/Coastal Ecosystems Section
South Florida Water Management District
3301 Gun Club Road

West Palm Beach, Florida 33406
(561) 682-6387 or (800) 432-2045, ext. 6387

From: Carroll, Camille <adarbyca@sfwmd.gov>
Sent: Wednesday, July 15, 2020 1:09 PM
To: Edwards, Toni <tedwards@sfwmd.gov>; Anderson, H. David <dander@sfwmd.gov>; Bousquin, Steve <sbousqu@sfwmd.gov>; Brown, Jennifer <jebrown@sfwmd.gov>; Brown, Michael <mcbrown@sfwmd.gov>; Canney, Emily <ecanney@sfwmd.gov>; Frost, Jessica <jfrost@sfwmd.gov>; Glenn, Lawrence <lglenn@sfwmd.gov>; Medellin, Donald <dmedelli@sfwmd.gov>; Morrison, Matthew <mjmorris@sfwmd.gov>; Neidrauer, Calvin <cal@sfwmd.gov>; Scala-Olympio, Laura <lscalaol@sfwmd.gov>; Sculley, Sean <ssculley@sfwmd.gov>; Sluth, Janice <jsluth@sfwmd.gov>; Sunderland, Simon <ssunder@sfwmd.gov>; Vitani, Nicholas <nvitani@sfwmd.gov>; Welch, Zach <zwelch@sfwmd.gov>; Wilcox, Walter <wwilcox@sfwmd.gov>
Subject: RE: SouthPort Ranch, LLC

This area is hydrologically connected to the Headwater Lakes (via Reedy Creek), but is upstream of the resource. No withdrawals are being permitted from waterbodies south of Lake Tohopekaliga, so water levels will only be affected in this area through reduced flows from withdrawals upstream. These reductions are capped at what would equate to no more than a 5% reduction in average annual flow to the Kissimmee River. The timing of these reductions will primarily occur when the water is considered excess of downstream needs (Lake O releases are being made and water levels are above WRLs in individual waterbodies) and are not expected to significantly change the hydrology of the Headwater Lakes and the dependent plant communities. As for flood risks to properties surrounding the water reservation waterbodies, that is outside the scope of this rule. Those risks are evaluated and regulated through the Army Corps of Engineers regulation schedules for each waterbody.

Our response is based on the below map, which is an area south of Toho, west of Cypress, and shows land we have in our Land Resources layer that references Southport Ranch as project name or owner (yellow). The 52.5 (red) and 54 (green) foot elevation lines are also included.
<image001.png>

Camille Carroll
South Florida Water Management District
I will be working remotely until further notice. I have access to emails (working hours: M-F, 8-4:30).
I can also be reached at 561-682-6732 or 561-371-1576.